

Individual Letters

From: Lynne Morin <lynnemariemorin@gmail.com>
Sent: Friday, November 22, 2024 10:56 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Proposed casino on Old Redwood Highway and Shiloh Road, Windsor, CA

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard: There are multiple large apartment complexes under construction or newly constructed within a 1/2 mile of the proposed casino. These were not under construction when the environmental report was done. Old Redwood Highway is a 2 lane road connecting Santa Rosa to the south to Windsor and to Healdsburg to the north. My house burnt down in the 2017 wildfire (the Tubbs Fire) in 2017. I barely got out alive with the roads being clogged due to evacuations. There were 4 other major wildfires in this area.

Putting a casino here is the absolute wrong fit for this neighborhood. The current vineyard is a fire break between the foothills and the town and the 6 newly constructed (or under construction) apartment complexes. I strongly oppose this casino for safety reasons.

Lynne Morin
Asset Manager
Chevalier Partners
1014 Hopper Ave. #318
Santa Rosa, CA 95403
415-250-7994 mobile
lynnemariemorin@gmail.com

From: LaBonte Family <labonte06@gmail.com>
Sent: Friday, November 22, 2024 12:00 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Mr. Broussard,

My family and I are longtime Windsor residents and happen to live within a mile of the proposed Koi Nation Casino Project. We, along with all of our neighbors and clearly the vast majority of Sonoma County residents, vehemently reject the notion of building another large casino in Sonoma County. Here are a few of the main reasons we do not want another casino in Sonoma County let alone in Windsor:

1. Lack of infrastructure supporting thousands of people coming and going daily.
2. Close proximity to residential neighborhoods.
3. Increased noise, traffic and litter.
4. Increased crime, prostitution and drug users in the immediate area.
5. The Koi Nation is not even from Sonoma County, let alone Windsor/Santa Rosa.
6. We already have two large scale casinos in Sonoma County.

Thank you for your consideration and I hope you move to reject this proposal which is clearly the right decision.

Sincerely,
Nicolas and Raquel LaBonte
124 Anna Dr.
Windsor, CA 95492
(707)570-9229

From: Janice Lon <janlonny@gmail.com>
Sent: Friday, November 22, 2024 12:47 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Please no new Casino on Pleasant Ave, Windsor

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Hello, I lived on Chalk Hill Rd for many years.

My concerns are for water usage, traffic congestion & gambling has become a huge addiction. I myself have gambled & had fun & have not become addicted but many others have.

Thank you,
Janice Kane
317 Decker St
Santa Rosa

Sent from my iPhone

From: dcraigm@aol.com <dcraigm@aol.com>
Sent: Friday, November 22, 2024 3:28 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: betsymallace@yahoo.com <betsymallace@yahoo.com>
Subject: [EXTERNAL] Koi Nation (Final EIS)

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Chad Broussard -

I have read, with both interest and amusement, the Koi Nation final EIS and the accompanying Appendix P in which the BIA responds to the comments to the draft EIS that it received.

With respect to those comments, on November 13, 2023 I submitted comments in which I documented that the members of the Koi Nation are not "Indians" as section 19 of the Indian Reorganization Act defines that term (and therefore are not eligible to have the secretary of the interior take the title to land into trust for their benefit), and that the Koi Nation is not an "Indian tribe" as section 4(5) of the Indian Gaming Regulatory Act defines that term.

Nevertheless, nowhere in the final EIS is either of those matters discussed. Nor in Appendix P is there any mention that I submitted those comments.

I would appreciate being informed as to why the BIA believed it had no obligation to consider, and then respond to, those comments.

Thanks,

Donald Craig Mitchell

From: Linda McBride <lmcbride4@comcast.net>
Sent: Friday, November 22, 2024 7:40 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard,

I am writing to express my significant concerns about this project and ask that the building approval of the Casino at the corner of Shiloh Road and Old Redwood Highway be denied.

This project is proposed within a well-established residential neighborhood. Children play organized sports across the street in Esposti Park. A new low-income apartment complex is being built on the opposite corner which will house many children. The road leads to Shiloh Ranch Regional Park where families walk on a regular basis. We cannot have a casino in this location. It is not safe. Not only do casinos bring unwanted crime to the areas in which they are built, this corner is a major thoroughfare for exits during emergencies like wildfires. Yesterday, we experienced flooding on and near that property due to torrential rain and traffic came to a standstill. If that happens during a wildfire, people could die.

I have read the impact reports and they are wrong. The impact on this community would be significant and dangerous. Please ensure that this does not happen.

Thank you,
Linda McBride
625 Shagbark Street
Windsor, CA 95492

From: Francie <fsimonson1968@yahoo.com>
Sent: Friday, November 22, 2024 8:09 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] No Casino in Windsor

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I hereby protest any new casinos being built in Sonoma County. Please, no more!

Frances Simonson
636 Wisteria Lane
Santa Rosa, CA 95407
(628) 600-8441

From: Anne Exton <exton@sonic.net>
Sent: Saturday, November 23, 2024 7:37 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi resort Casino project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Chad,

I have lived in Sonoma county for 50 years which means I have a long range view of my home area. We have two large casinos here right now, River rock and Graton.

Adding another casino is redundant and does our local economy very little good in terms of what people spend relative to what they earn. In addition, a big casino on Shiloh Road would tear up a lovely rural neighborhood. This area is not set up for the amount of traffic or noise that it would produce. Please, take the best interests of the majority population seriously and do not approve this project.

Sincerely,
Anne Exton

Sent from my iPhone

From: Dan Takasugi <dtakasugi@yahoo.com>
Sent: Saturday, November 23, 2024 8:07 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comment, Koi Nation Shiloh Resort and Casino

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

From:
Dan Takasugi
7500 Rafanelli Lane
Windsor, CA 95492

Subject: FEIS Comment, Koi Nation Shiloh Resort and Casino

I do not believe that my Aug 8, 2024 EIS comments (Exhibit I111 of Appendix P) were addressed in the FEIS.

In particular, I would like my comment addressed on the trip distribution and assignment assumptions of Section 4.3 to which I commented, "I believe the trip distribution and assignment assumptions of Section 4.3 do not align with my observations, being a resident of this immediate area for the past 17 years. I would like to know how the trip distribution and assignment percentages were calculated. I would think that the percentage of trip generation from 101 to the south would be far higher than 45 percent."

Please provide a response to all my comments in my comment letter of August 8, 2024. I am submitting this FEIS comment prior to the December 23, 2024 response deadline.

Thank you.
Dan Takasugi

On Thursday, August 8, 2024 at 09:09:47 PM PDT, Dan Takasugi <dtakasugi@yahoo.com> wrote:

To:

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

From:
Dan Takasugi
7500 Rafanelli Lane
Windsor, CA 95492

Subject: EIS Comment, Koi Nation Shiloh Resort and Casino

I am specifically commenting on the Traffic Impact Study (TIS) as presented in Appendix I of the EIS (publication July 2024).

I noted that the turning movement data for Existing Traffic Conditions in Section 3.1 of Appendix I were collected on January 28, 2022 and January 30, 2022. Then Average Daily Trip (ADT) data was collected on July 28, 2022.

The first problem is that Section 3.1 notes January 30, 2022 as a "Saturday". When January 30, 2022 was a Sunday. So a correction needs to be made one way or the other.

I believe that the EIS 2022 TIS traffic data is now too old to be used for this EIS analysis for the following reasons.

1. First, 2022 was not that long after the Covid pandemic, during which many local businesses were still encouraging and allowing work from home. This decreased the 2022 daily trips throughout this region of Sonoma County, but has now (2024) rebounded to pre-pandemic levels and possibly higher.
2. Second, it is not clear whether the TIS incorporated traffic counts from the currently constructing Shiloh Crossing apartment development located at 295 Shiloh Road. The project includes a total of 173 apartments and 8,000 square feet of commercial space. Other approved development projects and their expected trip counts should also be incorporated into the existing traffic conditions.
3. ADT counts were taken in July of 2022. This is a season when schools are typically not in session, nor are many after-school activities. A better peak time for ADT counts would have been in April or September of a given year.

Therefore, I request that the EIS perform a new TIS which includes recent traffic counts and incorporates expected new development within the project study area. I believe new traffic counts will show that some intersections and queue storage will fall below the LOS standards set for this EIS and will have a significant unmitigated impact.

I believe the trip distribution and assignment assumptions of Section 4.3 do not align with my observations, being a resident of this immediate area for the past 17 years. I would like to know how the trip distribution and assignment percentages were calculated. I would think that the percentage of trip generation from 101 to the south would be far higher than 45 percent.

I would also like to know how the traffic counts were conducted, whether through video detection, pneumatic tubes, or other. If through video detection, I would like to know specifically where the cameras were placed, as improper placement can affect the quality of the traffic count data.

Thank you for your consideration of this comment.

Dan Takasugi
7500 Rafanelli Lane
Windsor, CA 95492

From: Carolyn Moore <carolynmoore07@comcast.net>
Sent: Saturday, November 23, 2024 12:36 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Greetings,

I strongly oppose this project for a couple of reasons. The first is that there are two casinos within a very short distance which will most likely decrease their income.

Secondly, the people who are harmed the most by easier and easier access to gaming facilities are those who are least able to overcome loss upon loss upon loss. It's a lie to promote such a facility in the name of improving anything or there being a "good" chance at winning anything.

In order to make money from such an endeavor, money has to come from people. There's nothing they get in return.

It's pretty much agreed that gambling can be a life/ family destroying addiction. Why in the world would we want to make it easier for such an establishment to exist?

Obviously, I opposed the two that already exist. I vehemently oppose this one.

Carolyn Moore

Sent from my iPhone

From: David Cohen <david@cohen.net>
Sent: Saturday, November 23, 2024 8:15 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard,

I am a resident of Windsor, California and my wife and I live approximately four miles from the proposed site of this proposed project.

We travel by this area almost every day.

It is difficult to believe that a project of this magnitude could be considered for this area. We are, of course, opposed to this site. We are not opposed to a resort/casino placed in a more remote industrial location. But this location has so many reasons to reject the project. There are reasons most residents and nearly all politicians oppose the project. Why would the Bureau disregard such universal opposition? Surely, the Bureau could encourage the Koi to seek an area they'd be welcome.

Sincerely,

David Cohen
9600 Lakewood Drive
Windsor, CA
95492

David Cohen
408-499-7152
david@cohen.net
<https://www.DavidCohenGallery.com>
@DavidCohen1



"If you hear a voice within say you cannot do something, then by all means, do that thing, and that voice will be silenced." -Vincent van Gogh

From: Peter F. Neumeyer <neum1400@aol.com>
Sent: Saturday, November 23, 2024 1:21 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] casino

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Dear Chad.Broussard,

I live a half hour drive south of the proposed casino. I am sure others have written eloquently about the traffic congestion, not only during emergencies, but even just on regular days. A crowded casino is a hazard to us all who must escape on local and country roads and on Highway 101 in case of a catastrophe.

So perhaps the only quasi-original contribution I can make is the observation that dependence on an often-sick obsession like gambling is pathetic, and a disservice to Indian tribes who have been bamboozled on this continent for more than 300 years. Training these sad folk in some art or trade that ennobles them, that will be an example for their next generation, and is what is to be demanded. If the tribes have not themselves the awareness of their present humiliation, and of

worthy graduations from their status, then that--
too--should be a national priority. It would not
infantilize original populations. It would
raise **their** awareness well above their present
abject condition which is so much the "white
man's" fault.

Sincerely, Peter F. Neumeyer

From: Sam Lando <samrlando@yahoo.com>
Sent: Saturday, November 23, 2024 10:39 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Comment on KOI proposal for Windsor CA

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Chad - per an article in our local Sonoma County newspaper (the Press Democrat), I am emailing you my opinion/thoughts on the proposed KOI Nation project.

My family and everyone who knows anything about this is 1000% opposed to this project:

1. because of the rezoning of agriculture property
2. It's a residential & ag area
3. An absolute invasion by a non native tribe seeking special anemones from the general gov in a land grab of property that has nothing to do with their tribe of history. This is an embarrassment for that group of people as well as those considering moving it forward.

- PLEASE do not allow this project to proceed!!!

Thank you,

Very concerned,

Sam Lando

[Sent from Yahoo Mail for iPhone](#)

From: Lesley Alexander <lellya@comcast.net>
Sent: Sunday, November 24, 2024 9:01 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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Resending our comments regarding the Koi Nation Shiloh Resort and Casino:

No Casino In our Residential Neighborhood.

We are submitting our comments on why we oppose the Koi casino project:

The two lane Shiloh road cannot support the traffic in an emergency - just a country lane. We live nearby and have been evacuated twice in the past during the fires. We have been caught in the traffic clog at Shiloh and Old Redwood Highway trying to get to the freeway with fire raging in Shiloh Park above the proposed project.

The residents across from the project will be greatly impacted by traffic/noise/lights in and out 24 hours a day. These are working people who need their rest at night. Crime may increase, especially vehicle break ins. Property values will decrease. This is a residential neighborhood.

We already have a housing project on the opposite corner which is almost completed where it has been determined there is not enough parking for the residents who will live there - so there will be more vehicles parked on the street adding to more problems. All this in a residential two lane highway area.

Where will the water come from?

County officials reached an agreement with the Lytton Band of Pomo Indians in 2015 to refrain from building a large planned casino on their sovereign land in north Windsor or anywhere else in the county. - so why allow a casino to be built in this residential neighborhood by the Koi Nation when apparently their roots are in Lake County?

Our objection to this casino has nothing to do with the Koi Nation or any other nation - this is not the location for a Casino no matter who is applying.

Respectfully,

Lesley and Jerry Alexander
136 Anna Drive

From: Stephanie Lennox <stephanielennox@comcast.net>
Sent: Sunday, November 24, 2024 9:50 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Windsor CA Koi

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BIA,

Please consider the incredible impact to a community when advocating for installing a casino in the middle of that community. In the case of the Koi Casino being proposed for the town of Windsor, the location as well as the natural resources that would be required to support casino operations, are two very obvious reasons to say absolutely no to this project/proposal.

Close by there are churches, schools, neighborhoods, preserved open spaces, small country roads and farming operations. It is so very odd to consider installing an adult entertainment business in a place where there is nothing that matches that. Taking just a minute one can see how very destructive this gambling operation would be to all the surrounding land/human uses.

Except that it is close to a freeway on/off ramp, there is NOTHING positive about this proposal. The revenue it would generate for the city/county is NOTHING. Meaning, associated increase in predictable human behavior and consequences to the community where a casino has been installed will overpower any possible revenue benefits. There will be an increase in crime of ALL kinds. There will be an increase in traffic problems, noise, air and light pollution. There will be an increase in the use of natural resources, especially water. There are so many more challenges that come to a community when a casino comes into that community. I believe I don't have to further detail this because gambling operations' extreme negative effects on the hosting community are a well-studied, well-known fact.

Please protect our community from the harm that will come if an adult entertainment business is to be allowed into a small, rural town. There are thousands of other appropriate locations that don't involve overtaking, contaminating and destroying a whole town in the process. Please help the Koi find an appropriate place for their business that is not in a small Sonoma County town.

Thank you for your time and consideration.

Stephanie Lennox
707-206-5147

From: Gabriel Greene <gabrielgreene30@gmail.com>
Sent: Sunday, November 24, 2024 11:27 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Hello

I want to express my opposition to the Windsor casino. It is near a residential neighborhood and will create a traffic problem, especially if we have to evacuate from fire danger as happened in 2019. We already have two casinos in Sonoma County which are not located near residences. Please do not allow the Koi nation to build a casino so far from their tribal lands.

Thank you
Gabriel Greene
Windsor resident

From: Ron Grassi <ronsallygrassi@mac.com>
Sent: Sunday, November 24, 2024 4:52 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard:

We are writing to voice our DISAPPROVAL of the Koi Resort-Casino Project. Sonoma County does not need any more casinos! There are other casinos in close proximity to this proposed casino and the disruption of another such project is unwarranted. The environmental impacts are all negative for Sonoma County: Pollution, noise, crime, increased traffic, fire, etc. The land itself is not even a true part of the Koi Nation.

Please deny this project and protect the bucolic nature of Sonoma County.

Thank you for your attention to this request.

Sincerely,

Ron nd Sally Grassi

1703 Saddle Draw
Healdsburg, CA 95448

From: Terry Abrams <terryabrams@hotmail.com>
Sent: Sunday, November 24, 2024 4:54 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, KOI Shiloh Resort & Casino Project

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Mr. Broussard:

As a 48-yr resident of Sonoma County in Larkfield, I would like to **strongly recommend against approval of the proposed KOI Shiloh Resort & Casino Project** at Shiloh Road and Old Redwood Highway.

This project is totally inappropriate for our community because of the negative impacts on the environment, substantially increased traffic and its huge size.

Additionally, State, County and local officials are all opposed to the project.

Thank you for your consideration.

Sincerely,

Terry L. Abrams

ABRAMS CONSULTING

Management Consultants

707-529-3662

terryabrams@hotmail.com

440 Mayfield Drive

Santa Rosa CA 95403

From: Sandy Metzger <sbaker@sonic.net>
Sent: Sunday, November 24, 2024 10:25 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard.

1. **Have you visited the area in Windsor CA of the proposed Koi casino and resort?** It's a rural, bucolic area where the rolling hillsides and flats are covered with productive and beautiful vineyards, farmhouses, and livestock. The roads are narrow.
2. Up the Shiloh hill are beautiful estates, with only that single road in and out. The proposed casino is directly on the corner where two rural roads intersect. In a fire or earthquake emergency, few escaping vehicles could drive through that intersection, and emergency vehicles wouldn't be able to get through and up into Shiloh.
3. What a shame to destroy the character of that neighborhood. It's criminal. That tribe doesn't belong there; it belongs in Clear Lake.
4. Two other major thriving casinos already exist not far from the Shiloh-Old Redwood Highway area. We do not need or want a third in such close proximity. In fact, two is one too many already. If you did any kind of study on the people who frequent these casinos, you would probably find that they are not local. We see buses of gamblers arriving from elsewhere to the casinos, many from San Francisco. Those people do not shop or stay in the local towns; they gamble and leave. You would find that many locals would not put a foot in those casinos; they resent the existence of the casinos and won't waste their money gambling there, eat in the restaurants, or conduct events there; casinos are a political hot potato here.
5. That tribe just went shopping around for land they could buy and where they thought they could put a casino. We don't want them to destroy that beautiful area. The traffic of cars and buses will be intolerable, especially since casinos operate 24/7. There will be noise pollution, light pollution, traffic pollution, and destruction of the local roads from the multitude of cars and buses.
6. It makes me sick when I think of how developers will rip up that land, bulldoze it, and construct a huge casino and 400-room hotel out there. The next thing we know is that the Koi will bribe the Windsor town fathers with money and other "benefits" to show what "good neighbors" they are. We know how this works. We've seen it before. Let the Koi continue to grow grapes there and produce fine wine.
7. You're an Environmental Protection Specialist? So, protect the environment. I'll bet you or someone could find a protected little lizard or rabbit or turtle or insect or plant out there to halt this project!
8. Have you found anyone but the Koi who are in favor of this project? No! Do not approve it. **Visit the land**, see for yourself how inappropriate the project is, and don't approve it. Don't just make your decision sitting behind your bureaucratic desk. **Visit the land**. This project and the Koi will not be appreciated.

Respectfully,
Sandy Metzger
Santa Rosa

Re: Notice of Availability for Final Environmental Impact Statement

Thu 11/28/2024 1:16 PM

From: Kathy Reiche**To:** admin@shilohresortenvironmental.com

Don't. You are not wanted. You suck. We have lost 80 percent of our forests. Don't kill your self and don't kill your children.

Sent from my iPhone

On Nov 21, 2024, at 7:36 PM, admin@shilohresortenvironmental.com wrote:

Please find attached the Notice of Availability of a Final Environmental Impact Statement and Final Conformity Determination for the Koi Nation of Northern California's Proposed Shiloh Resort and Casino Project.

NEPA-related documents and notices can be found at <https://www.shilohresortenvironmental.com/>. For additional information, please contact Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, Pacific Region, at (916) 978-6165 or by email at chad.broussard@bia.gov.

<BIA NOA Shiloh Resort and Casino FEIS.pdf>

Re: Notice of Availability for Final Environmental Impact Statement

Sat 11/30/2024 3:51 PM

From: John Stobel**To:** admin@shilohresortenvironmental.com**Cc:** chad.broussard@bia.gov

If this goes thru sonoma county is doomed ,maybe think about bringing legitimate business to the area because you have already screwed up traffic in the that intersection.

On Thu, Nov 21, 2024, 8:47 PM admin@shilohresortenvironmental.com <admin@shilohresortenvironmental.com> wrote:

Please find attached the Notice of Availability of a Final Environmental Impact Statement and Final Conformity Determination for the Koi Nation of Northern California's Proposed Shiloh Resort and Casino Project.

NEPA-related documents and notices can be found at <https://www.shilohresortenvironmental.com/>. For additional information, please contact Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, Pacific Region, at (916) 978-6165 or by email at chad.broussard@bia.gov.

From: Xavier de la Prade <zavyay@gmail.com>
Sent: Tuesday, November 26, 2024 8:30 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort & Casino Project

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Dear Mr. Broussard,
Here is my humble opinion about the Shiloh Resort & Casino. I am in my eighties. In the fifties and sixties, there were bowling alleys on almost every block. There were so many of them that most of them failed. The same would happen with casinos. Also, tribes should not encroach on other tribal properties. I personally would vote no on the Shiloh Resort.
Sincerely,
Xavier de la Prade
303 Crickett Court
Petaluma, CA 94954
707-769-9880

From: Diana Dodson <dianadodson60@gmail.com>
Sent: Friday, November 22, 2024 11:33 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL]

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No casino on Shiloh road! Drive out there and see for your self. It's too close to a residential area. The road cannot accommodate the increased traffic. It will destroy the peaceful beauty of that area. This tribe is not our own. They are from Oklahoma. Our community is very upset about this. Please do not allow this to happen.

From: Diana Dodson <dianadodson60@gmail.com>
Sent: Friday, November 22, 2024 11:34 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL]

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No!!!! Casino in this location.

From: Steve Vonk <svonk@pacbell.net>
Sent: Friday, November 22, 2024 3:43 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Steve Vonk <svonk@pacbell.net>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Chad Broussard,

Many residents and I are opposed to the casino being considered near South Windsor. We have a great concern with the extra traffic it will bring to our neighborhoods, and likely increased crime we expect to occur. The location for the Casino is a prime grape vineyard and will displace many plants that absorb CO that caused our planet to warm. Our children will be exposed to the gambling element in their own back yards which breed addictive behaviors. Please don't allow this Casino to go forward.

I am opposed to the Shiloh Resort and Casino Project.

Regards,

Steve Vonk
6282 Old Redwood Hwy
Santa Rosa, CA 95403-1123
svonk@pacbell.net

From: l.landry616@yahoo.com <l.landry616@yahoo.com>
Sent: Friday, November 22, 2024 5:45 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project"

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My name is
Laurie Landry
5830 Leona Ct
Windsor, Ca 95492

I have two reasons why this casino is a bad idea.

Right now the land in question is under water with 2 days of rain. Developing that land would lead to flooding to the neighborhoods that surround the property. Our homes would be damaged roads would be impacted with closures.

A casino/resort will bring in unwanted traffic that will threaten the lives of all of us who live in the homes that surround the property during the next fire that comes through here. The small two lane country roads that the property is surrounded by will not be able to handle the cars and buses of patrons and workers trying to evacuate the casino while we the residents are also trying to evacuate. Picture the recent fire disaster on Maui, or Paradise Ca where people died burnt in their cars.

You were given, what looks like a pristine piece of land with nothing around it. I suggest that it was artfully taken or photoshopped so all the homes, schools, businesses and churches that actually line Shiloh Rd on the North side, old Redwood Hwy on the west side, and the businesses and homes that surround the property itself don't seem to be there. Also, Old Redwood Hwy is a 2 lane road not an actual highway.

As a long time resident I am asking you to please not approve this casino in this area. A neighborhood is not a proper place for a casino. In the case of this area it could be a deadly decision and if it is approved and we find ourselves in the worst possible situation fire and people die there will be only one place to look as to why this happened. Who approved such a thing. What were they thinking.

Please do the right thing.

Also please if you haven't done it yet take a look at google earth map of the area and see for yourself to see the amount of homes that are right across both roads from the proposed site.

Thank you for your time.

Do the right thing. There is a better piece of land for the Koi this is not it

Laurie Landry
5830 Leona Ct
Windsor, CA 95492

Sent from my iPad

From: B.A.R. Packaging <barptc@hotmail.com>
Sent: Saturday, November 23, 2024 7:38 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Shilo resort and Casino project

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This proposed casino project would have a terrible impact on this community. We already have enough flooding and traffic issues without having to accommodate the additional traffic and crime a casino would dump into our neighborhood.

Patricia Crawford
251 Colonial Park dr.
95403
Sent from my iPhone

From: Mike Stone <mike4realestate@yahoo.com>
Sent: Saturday, November 23, 2024 4:47 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] PLEASE No Koio Nation Shiloh Resort Casino!

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Hello,

This is one of the worst places for a casino that any reasonable person could imagine. Shiloh is a narrow two-lane road already used by many to access Federal Hwy. 101 (freeway) by many residents and with the increasing wildfire hazard, it is the only safe and sensible evacuation route for too many. The increase in traffic at this location will pose a danger to residents' inability to evacuate in time and present major traffic congestion on this already well-traveled and narrow two-lane road. Shiloh Road is already taxed by traffic from many residential subdivisions, plus there are two new high-density and yet-to-be-occupied residential apartment complexes nearing completion as we speak which will contain hundreds of new units in addition to the many residential subdivisions nearby and the large shopping center anchored by Walmart that already depend on Shiloh for access to the freeway daily and in the event of evacuation in this very high fire hazard area.

I read the environmental impact report and the other studies and in my opinion, it was obvious that they were most likely hand-selected for their financial motivation to prepare reports with the desired outcome because their findings are absurd.

Gamesmanship is all too common and you and the BIA are the last defense to stop the systematic and strategic manipulation of the facts in an obvious attempt for very few to benefit financially and disproportionately at the expense of many.

There are an almost unlimited number of far more suitable locations than this that I'm sure the Koi people can find that will not have a major adverse effect like it will on the residential nature of the community that surrounds this proposed project.

Please see through this obvious bad choice of a location and do the right thing by declining to approve the Koi Nation Shiloh Resort and Casino. They could literally throw darts at a map with a blindfold on and 99 out of 100 times find a significantly better-suited location than this one.

Thank you for your concern and consideration.

Sincerely,

Mike Stone, Realtor®
CA DRE License #01139380

(707) 836-3445 Cell

www.sonomacountyhomepro.com

See my reviews by [clicking here](#)

From: Ctwiley <ctwiley@aol.com>
Sent: Saturday, November 23, 2024 6:34 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Good day.

I am a lifelong Sonoma County resident and am writing to vehemently object to allowing a casino/resort or any other type of large nonagricultural development to be built on Shiloh Road in Windsor, CA. I am not sure if you are familiar with this bucolic area, but a casino/resort would be absolutely incongruous in the area. The Shiloh Ranch Regional Park is nearby, approximately 25 miles from our home. This is a beautiful 850-acre park with hiking and biking trails, horseback riding trails, a picnic area and group picnic area perfect for families, as well as panoramic views of Northern and Central Sonoma County. My husband is part Native American and his love and respect for nature and natural areas is paramount to none and we cannot fathom how a Native American tribe would want to desecrate this area by building this project. The Koi are apparently not native to the area - they were from Lake County, and it appears that they are "casino shopping".

This casino/hotel would create a traffic nightmare for the entire area and for people traveling to and from the park. The noise would be unbearable for the neighbors, the water usage is not sustainable as Sonoma County has often experienced drought and county residents are continually asked to conserve water during the summer. The fire danger is well documented in this area, as the 2017 Tubbs Fire and the 2019 Kincade Fire each came within a half mile of the proposed casino/hotel site. Evacuations would be a nightmare on the nearby two-lane roads. Apparently, another tribe has proposed a casino and housing project. I am not aware of the details of this; however, it seems that this would be a much better location for this type of development. Sincerely, how many casinos do we really need?

When the Federated Indians of Graton Rancheria built one of the Bay Area's largest gaming facilities in Rohnert Park, it was completely harmonious with the surrounding area. Any business could have been built where the casino and hotel is - a supermarket or big box store, hospital or whatever. It is right off the freeway with easy access and egress, in an area surrounded by various businesses and not anywhere near an agricultural area nor a huge regional park or open space. I have been there many

times, and it is a gorgeous facility with a fabulous hotel and restaurants, a beautiful gaming area and plenty of space for parking and apparently their original rancheria was nearby. They were true natives and their respect and love for the land is evident. This would be an example of "paving paradise and putting up a parking lot".

Please do not allow this to happen.

Sincerely,

Nancy and Steve Weiler
PO Box 432
Boyes Hot Springs, CA. 95416

From: Keri Davis <keridee1972@gmail.com>
Sent: Sunday, November 24, 2024 8:39 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard:

As a Sonoma County/Santa Rosa. California native for 62 years, I support and welcome the approval of Shiloh Casino.

Gavin Newsom has shown opposition to Shiloh. Additionally, bias and/or preferential treatment Re. Graton Casino has been apparent dating back to at least 2020 (COVID curfews, restraints, lockdowns, shutdowns, etc.), if not further back, before 2020.

Whether any conflict exists or not, favoritism in any capacity seems unusual and inappropriate with regard to the position of governance.

I stand in support of Shiloh Casino and anticipate and await your approval.

Very truly yours.

From: Jason Tuck <jtuck1970@gmail.com>
Sent: Monday, November 25, 2024 11:15 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Name: Jason Tuck / jtuck1970@gmail.com / 707-529-3251

Return Address: 9111 Saint James Pl., Windsor, CA., 95492

11/25/2024

Subject: FEIS Comments / Shiloh Resort and Casino Project

Greetings Sir or Madam,

I am writing to express my deep concern and disapproval of the proposed KOI Nation Casino Resort project in Windsor, CA..

As a longtime resident of Windsor CA., the proposal of the KOI Nation Casino has me concerned on several levels. The town of Windsor is a small community made up primarily of families with small town community values. Windsor is flanked by a casino 15 minutes to the south and another casino 15 minutes to the north. There is no need for yet another casino bordering our neighborhoods. Simply put, Windsor is not the appropriate location for yet another Indian casino.

A new casino development would bring in gamblers from all over, potentially flooding our streets with new (transient) vehicle traffic causing heavy congestion on our already congested roadways. In addition to unnecessary traffic, the increase in vehicle traffic would also have a massive impact on parking in town and during local events. While the parking is simply an inconvenience, the increased vehicle traffic would make it next to impossible to get around town efficiently during peak hours.

Another more deeply concerning issue is the safety of Windsor residents. Windsor has been affected by several ferocious wildfires in recent years, such as the Tubbs Fire (2017) and the Kincade Fire (2019). During each fire event, countless families in Windsor were

displaced from their homes during the emergency evacuation process. During the evacuations, the streets of Windsor were impacted so badly that most residents could not leave town if they had to, as the vehicle traffic was so bad you could not drive on the streets. Imagine being awakened in the middle of the night surrounded by fires in every direction and heavy smoke in the air and not being able to evacuate due the streets being filled with cars bumper-to-bumper moving at zero miles per hour. Effectively leaving many residents stranded with no way to get their families away from danger. At the time of evacuations, all gas stations were out of fuel, all stores were out of essential items like water, batteries, milk, bread, etc..

The wildfires and subsequent evacuations were a truly traumatic experience for everyone in our community. Safety of Windsor's residents is paramount in this situation and the Koi Nation have grossly overlooked this fact. If you were to add a casino to Windsor and another severe wildfire were to occur followed by emergency evacuations, the additional vehicle traffic with drivers in a full panic mode would prove to be detrimental to our community. Worse yet, the first responders, FireFighters and law enforcement agencies would not be able to do their job due to severe vehicle traffic during the state of emergency. The aforementioned concerns are a few (of many) examples that could demonstrate how the addition of a large casino resort in Windsor would adversely impact the overall safety of the Windsor community.

Lastly, the Koi Nation tribe are not (and never were) indigenous peoples in the Windsor area. The Koi tribe settled in and around Clearlake, CA. area and did not settle in Windsor. As such, the Koi Nation has ***no right*** to develop the 68 acres on East Shiloh Rd., Windsor, CA. into a casino resort. It is abundantly clear that the Koi Nation are attempting to use their Native American status to force the issue of converting the land into a trust so they can build a casino in Windsor for their own interest. In simple terms, Windsor residents unanimously propose the Koi Nation /Shiloh Resort and Casino Project.

I look to the community leaders to STOP the proposed Shiloh Resort and Casino Project, as a casino does not belong in our small town community. The residents of Windsor stand united against the Shiloh Resort and Casino Project.

Thank you for your time and consideration.

Kind Regards,

Jason Tuck

From: Peter Walker <pwalker49@gmail.com>
Sent: Monday, November 25, 2024 9:31 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Regarding FEIS Comments, Shiloh Resort and Casino Project.

Opposition to the Proposed Shiloh Resort and Casino Project Environmental Impact Statement

The Environmental Impact Statement (EIS) for the Proposed Shiloh Resort and Casino Project demonstrates a deeply flawed approach to analyzing and mitigating critical environmental and community concerns. While the document presents a series of optimistic projections regarding noise, hazardous materials, and wildfire risk, it systematically underestimates or dismisses the potentially severe consequences of this large-scale development in Sonoma County. This opposition highlights the key areas where the EIS fails to adequately address the project's true impacts.

1. Noise Impacts: Misleading Assumptions and Downplayed Effects

Off-Site Traffic Noise: The EIS claims that the traffic noise from increased vehicle activity will not result in significant adverse effects. However, the analysis relies heavily on baseline conditions that already exceed acceptable thresholds (67 dBA for residential uses) and dismisses a 3 dB increase as imperceptible. This approach ignores cumulative noise pollution impacts, particularly in a region where residents are already burdened by high noise levels. Additionally, the report fails to account for peak event traffic, such as large gatherings or high-occupancy weekends, which could exacerbate noise levels and significantly degrade residents' quality of life.

On-Site Noise Sources: While the EIS asserts that on-site operational noise sources will fall below local noise standards, it neglects to consider noise disturbances from non-measured sources, such as late-night entertainment, crowd noise, and event-related announcements. The reliance on idealized noise modeling, without factoring in real-world deviations, weakens the credibility of the report's conclusions. Sensitive receptors, such as homes and schools, will undoubtedly experience disruptive increases in noise, undermining the well-being of community members.

2. Hazardous Materials: Superficial Analysis of Risks

Construction Risks: The assessment dismisses the possibility of encountering undiscovered contaminated soils or the mishandling of hazardous construction materials, despite the presence of historic agricultural activity on the site. The statement that "no adverse effects" will occur during construction relies entirely on theoretical adherence to best management practices (BMPs). Yet BMPs are only as effective as their implementation, and the EIS does not outline adequate enforcement mechanisms or contingency plans for accidental releases.

Operational Risks: The potential risks associated with diesel fuel storage for emergency generators and chemical use in water treatment facilities are downplayed as "not significant." This conclusion assumes flawless compliance with regulations and manufacturer guidelines—a best-case scenario that does not

reflect the real-world likelihood of human error or unforeseen incidents. Moreover, the transportation of hazardous materials on local roadways introduces additional risks to the surrounding community that are insufficiently mitigated in the report.

3. Wildfire Risk: Underestimating Severity in a Fire-Prone Region

The project site lies in a high wildfire-risk area, with a documented history of devastating fires, including the Tubbs and Kincade fires. The EIS acknowledges the site's proximity to moderate and high wildfire risk zones yet asserts that fire-resistant building materials, defensible space, and riparian corridor management will adequately mitigate risks. These measures are inadequate in the face of increasing wildfire frequency and severity due to climate change. Furthermore, the proposed increase in human activity and infrastructure creates more ignition sources, directly contradicting the goal of reducing wildfire risk.

The analysis of evacuation impacts during emergencies is particularly concerning. The assumption that evacuations will follow a predictable timeline (4–6 hours based on prior events) ignores the chaos and unpredictability inherent in wildfire situations. The project's potential to exacerbate evacuation bottlenecks, jeopardizing the safety of thousands, is irresponsibly downplayed.

4. Cumulative Impacts and Alternatives: Failure to Account for Long-Term Consequences

The EIS inadequately considers the cumulative impacts of this large-scale development. The introduction of a major resort and casino in an agricultural area will place significant strain on local infrastructure, water resources, and emergency services. By analyzing noise, hazardous materials, and wildfire risks in isolation, the EIS neglects the interconnected nature of these impacts. For instance, increased traffic and urbanization may amplify both noise pollution and wildfire risks, while straining emergency response capabilities.

The proposed alternatives (e.g., Reduced Intensity and Non-Gaming) are superficially analyzed without substantive consideration of how these scaled-down options might better align with community and environmental preservation goals. The dismissive treatment of the No-Action Alternative further underscores a lack of commitment to exploring sustainable, community-driven solutions.

5. Inadequate Community Engagement and Transparency

The EIS lacks evidence of meaningful community engagement, failing to incorporate the concerns of local residents and stakeholders who will bear the brunt of the project's impacts. Residents of Sonoma County and the Town of Windsor deserve a transparent and inclusive planning process that prioritizes their health, safety, and quality of life over the interests of a private development.

Conclusion: Reject the Proposed Project

The Proposed Shiloh Resort and Casino Project represents a significant threat to the environmental and social fabric of Sonoma County. The EIS is replete with overly optimistic assumptions, insufficient mitigation measures, and a failure to address the real-world risks and consequences of this development. For these reasons, the project should not proceed in its current form or its proposed alternatives. Decision-makers must prioritize sustainable development and robust community engagement to protect the unique character and natural beauty of the region. The proposed casino and alternatives are incompatible with Sonoma County, the town of Windsor, and its surrounding communities.

Submitted by Peter Walker
12620 DuPont Rd.
Sebastopol, CA 95472
Email: pwalker19@gmail.com
11/25/2024

From: David Fiano <davefiano@icloud.com>

Sent: Tuesday, November 26, 2024 8:30 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] "Here are a few reasons why this Casino Project would be a disaster for Sonoma County and the town of Windsor."

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I don't see any objections here that wouldn't be true of any construction project of its kind. More "NIMB-ISM" seemingly.

Join Nextdoor, an app for neighborhoods where you can get local tips, buy and sell items, and more
nextdoor.com

davefiano@icloud.com

From: Harold Minkin <haroldminkin6@gmail.com>
Sent: Wednesday, November 27, 2024 9:26 AM
To: Dutschke, Amy <Amy.Dutschke@bia.gov>; Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Harold Minkin <haroldminkin6@gmail.com>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Thank you both for sending me the letter regarding the proposed Shiloh Casino.

Attached is my letter regarding my concerns of having this casino built where I live...

Regards,

Harold

Harold Minkin
807 Dizzy Gillespie Way
Windsor, CA 95492
707-837-5696(h)
707-799-6798(c)
haroldminkin6@gmail.com

November 27, 2024

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

Chad Broussard
Environmental Protection Specialist
Bureau of of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Dear Ms. Dutschke and Mr. Broussard

Regarding: **"FEIS Comments, Shiloh Resort and Casino Project"**

I am writing to you again as I am a citizen of Windsor, California. I participated on the zoom call on July 30, 2024 at 6 PM. A majority of the people who were on the call were against having a casino built at the proposed location. The Governor of California, the Town Council of Windsor, Town Council of Santa Rosa are against having a casino built. The residents who live near Shiloh Road will be inundated with noise, traffic, light pollution and reduced access to Shiloh road in an emergency!

The casino will affect local businesses and adjacent casino's. In your report you state there will be an overlap of potential market area and project site. **Four casino's affected will be: Graton Resort and Casino, Cache Creek Casino Resort, River Rock Casino and San Pablo Lytton Casino.**

Secondary markets that will also be affected are: **Twin Pine Casino and Hotel, Coyote Valley Casino and Hotel, Robinson Rancheria Resort and Casino, Konocti Vista Casino Resort and Sherwood Valley Casino.**

Here are the many issues brought up:

The Koi Nation is from Clear Lake, CA not from Santa Rosa, CA. They are 60 miles from their native lands. No casino has been built in California farther than 15 miles from their native lands.

It has been mentioned that an increase of tourism will occur and the town's businesses will see an increase. I know for a fact when I worked in Geyserville at a winery, we did NOT see an increase in business from those going to the Casino. Many came and left by charter bus. We had an increase in auto accidents, noise and pollution.

The land has always been for Residential, agricultural and limited commercial use as mentioned in your EA report. It has Pruitt Creek that runs through the property and floods every year.

The road is only a two lane road and would cause extreme problems for the citizens who live nearby if and when they have a fire, earthquake or other natural disaster. The proposed casino stated in their Environmental Impact report expects to have approximately 2,000 to 5,000 people traveling on Shiloh Road each day. This could be the equivalent of 2500 cars each day.

The U.S Fish and Wildlife Service has stated the endangered Tiger Salamander, Red Legged Frog, potential issues to coho salmon that can be found throughout Windsor, CA. This was in an article on August 31, 2011 from Patch.com. Measure L mentions this in your report, my question is how do you control habitat needs? What measures are to be taken?

It has been proven that where there is a casino an increase in crime, drunk driving, accidents and more have substantially increased. Currently Santa Rosa and Windsor police forces are understaffed as well as the Sonoma County Sheriff's Department. In your FEIS report you mention having best management practices to solve these issues and shall "make best efforts to enter service agreements with the Sheriff and Fire Departments, again there are no guarantees which could result in an increase

The casino will also increase noise, air, lighting and groundwater pollution. This is addressed as only an LS (less than significant) issue. It is very much a *huge* concern to homes and businesses in the surrounding area.

During the proposed construction phase lasting from 2024 until the opening date of 2028, the large construction trucks and workers building from 7 am until 5 pm will create a lot of noise, traffic congestion and increase smog in the area.

Regarding housing, property values, schools and businesses near the proposed casino in your, "sensitive receptors" section you state only LS. Growth Inducing Effects as stated in your report state it will have a negative effect on roadways infrastructure, sewer and water services.

It is known that property values go ***DOWN between 2-10% near a casino!*** They will also be affected by construction noise, night lighting issues, air pollution from all the vehicles, etc.

The needed water of 170,000 gallons per day of potable water and 108,000 gdp of recycled water. Potable water supply would be provided via on-site wells, and recycled water (tertiary treated effluent) would be provided from the on-site wastewater treatment facilities (see Section 2.1.4). Recycled water would be used for toilet and urinal flushing, on-site landscape irrigation, on-site vineyard irrigation, and cooling tower makeup. Fire flow requirements for Alternative A are anticipated to be 2,000 gallons per minute for 4 hours assuming the use of automatic fire sprinklers consistent with applicable requirements of the Tribe's Building and Safety Code of 2023, which are consistent with the California Building Code (CBC, Appendix D-1). as mentioned in 2.1.3 in the report would require several wells at a depth of 700 ft. Currently the surrounding wells on homeowners properties, according to those who spoke on the zoom video, are drying up or are not usable. This brings up many issues, one is where will the casino get water if the wells cannot produce enough to support the casino, hotel and pool? This will impede growth for needed housing, agriculture and other businesses that depend on water.

Another item mentioned in the report is that the casino would be located in a "high fire zone". I did not find where the Koi Nation would be building a fire station nearby. Other major concerns are how to get all the

people safely evacuated. Regarding emergencies it is stated you will ONLY have three employees trained as a firefighter and EMT. ***This will NOT be enough workers to assist in case of an emergency***

Many callers who were given priority were from union construction companies. They claimed they would have continued work once the casino was built. The majority of calls from the public were against having a casino built on the proposed site.

I am hoping the Bureau of Indian Affairs denies the application for Acquisition in trust by the United States of approximately 68.60 acres adjacent to the Town of Windsor, Sonoma County, California for gaming and other purposes.

If the land does go into trust I am hoping the Koi Nation decides to do 3.13.3.5 Alternative D: No Action Alternative.

Regards,

Harold Minkin

From: Larry Lapidés <larry@lllapides.com>
Sent: Wednesday, November 27, 2024 10:20 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard,

With all due respect to the process to date, the FEIS is a one-sided view of the project. Also, the Koi Nation is trying to win this through marketing, not facts, and not through working with the local community. Regarding their marketing push, just view the 2 minute promotional video the Koi Nation produced, which is both incomplete and inaccurate. The video does not show, and does not talk about, the proximity of the project to residential neighborhoods. This proximity to residential neighborhoods would be incredibly unusual for a casino, and unwelcome just on general principles let alone issues like wildfire evacuations and water usage, traffic and noise and light pollution, and more. Second, the video ends with the statement by the narrator that the project "would benefit the Sonoma County communities where the Koi Nation has lived for thousands of years." In fact, the Koi Nation is from Lake County, not Sonoma County, so their statement is completely inaccurate.

The Koi Nation has not worked in good faith with the local community. All the local and state government officials, in an accurate representation of their constituencies, have publicly stated their positions against this project.

I strongly recommend against approval of this project.

Best Regards,

Larry

Larry Lapidés
larry@lllapides.com
(925) 519-1234

From: barb belling <barbbelling1@gmail.com>
Sent: Wednesday, November 27, 2024 5:06 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Oppose Koi Nation Shiloh Casino Resort

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To: Chad Broussard, BIA
Amy Duetscke, BIA
Deb Haaland, Secretary of the Interior

History of Koi Nation receiving questionable federal recognition:

December 29, 2000 was the last day Gover worked at Dept. of Interior. He FAST-TRACKED the approval contrary to staff objections.

The Koi Nation avoided the normal rigorous federal recognition process that most other Tribes had to go through.

SEE THE PUBLISHED reporting below:

Now, on the last days of Sec of Interior Deb Haaland's employment, the Koi Nation may again be fast-tracked to be granted in trust the 68 acre parcel on Shiloh Road in Santa Rosa to build a casino-resort, a project that is completely inappropriate for this

location surrounded by residential neighborhoods and parks and churches.

THIS LOCATION IS COMPLETELY WRONG FOR A CASINO RESORT. THERE IS NO BUFFER ZONE BETWEEN THE CASINO AND THE RESIDENTIAL NEIGHBORHOODS DIRECTLY ACROSS A 2-LANE STREET. There is NO SEPARATION of traffic from the residential neighborhoods and parks.

All the elected representatives from local to federal office have officially opposed this project. ALL THE LOCAL LEGITIMATE SONOMA COUNTY TRIBES OPPOSE THIS.

IT IS THE WRONG LOCATION. THE EIS prepared by the Koi Nation does not provide a complete and full evaluation of the adverse environmental impacts. The incomplete, partial and biased assessments do not consider the residential neighborhoods that surround the parcel.

Because there is NO BUFFER ZONE between the casino and the residential neighborhoods and parks, the adverse environmental impacts CANNOT BE MITIGATED as suggested by the EIS. The EIS does not consider the significant increase in residential population in the adjacent area based on two new large apartment complexes along East Shiloh Road, just across the street from this parcel. The EIS is deficient in its analysis of detrimental impact and lack of appropriate mitigation.

The presentation by the Koi Nation is misleading and based on fake background images that do not reveal the residential neighborhoods directly across a narrow two-lane road that provides the main access to the residential neighborhoods along Faught Road, leading to Shiloh Regional Park, Larkfield, and Mark West. East Shiloh Road is the main access to Shiloh Estates, Mayacama Golf Course, and to the Chalk Hill residences.

Also, this location is only 15 minutes drive from Graton Rancheria in Rohnert Park and only 15 minutes drive from River Rock Casino. Santa Rosa does not need 3 casino resorts in such close proximity, and the detrimental impact of this project will forever ruin the area.

So much destruction of property values, quality of life, environmental assets and aesthetics will result if the BIA/ Dept of Interior allow the parcel to be taken in trust. If allowed to be built, the casino resort will become a blight and by its own construction will destroy all the "Sonoma Wine Country" appeal for those travelling within the SCENIC CORRIDOR. There will be no appeal for tourists to choose this location over Graton Rancheria Casino Resort or River Rock. It will be doomed to fail because it is THE WRONG LOCATION.

Please DO NOT APPROVE this project for this site. IT IS COMPLETELY WRONG.

CBelden
resident Shiloh Road

From: Walt Maack <wmaack@gmail.com>
Sent: Thursday, November 28, 2024 7:22 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project"

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I was Emergency Department Medical Director in Healdsburg when the local River Rock Casino was opened. Our Emergency Department was soon busier with injuries from fights, overdoses, drug emergencies & auto accidents. Some residents of the Rancheria told me of needing to wear bullet proof vests in their community due to the festering problems between neighbors since the casino opened. I saw & still see little redeeming aspects to having a casino in our community.

So, I ask that the BIA see that having already two casinos in our county is MORE than enough. Please reject the plan for another drag on our community by NOT approving the casino application for the Shilo Road area.

Thank you,
Walt Maack, MD

From: David Cohen <david@cohen.net>
Sent: Thursday, November 28, 2024 9:51 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Open Mic: Wildfire Roulette in Windsor

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I hope you read this editorial since it sums up important reasons why the Bureau should not approve this development.

David Cohen

<https://www.healdsburgtribune.com/open-mic-wildfire-roulette-in-windsor/>

David Cohen
408-499-7152
david@cohen.net
<https://www.DavidCohenGallery.com>
@DavidCohen1
Windsor, CA



"If you hear a voice within say you cannot do something, then by all means, do that thing, and that voice will be silenced." -Vincent van Gogh

From: Marilyn Volpert <peanutsgrama@yahoo.com>
Sent: Thursday, November 28, 2024 12:40 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] This is how this entire area feels about the Koi intention of snarling traffic

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Open Mic: Wildfire Roulette in Windsor

Sonoma County residents are accustomed to the risks that wildfires pose. Earlier this year, we experienced a wildfire that forced residents into the all-too-familiar position of standing by for a potential evacuation order. This is why it is so imperative that proposed development projects anticipate strained evacuation routes before bringing more congestion to our roads. The Koi Nation's proposal to construct the Shiloh Resort and Casino ignores this responsibility.

Why hasn't someone visited this area? And see the problem with evacuation, etc. The casino in Guerneville is small and there are not thousands and thousands of people living RIGHT next to it. They won't have the problem this casino will put upon our residents.

Our children! Think of them. Our seniors! Think of them. They need reassurance that they will be able to escape. The last time we had to evacuate there were less people. Now the Shiloh area is filled with storied apartments. Thank you for listening. I hope you can see the problems. Marilyn Volpert 8085 A Street, Windsor, Ca. 95492

From: C Belden <kst@sonic.net>
Sent: Thursday, November 28, 2024 1:17 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS COMMENTS - Koi Nation Shiloh Casino Resort project - OPPOSE

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To: Chad Broussard, BIA
Amy Duetscke, BIA
Deb Haaland, Secretary of the Interior

History of Koi Nation receiving questionable federal recognition:

December 29, 2000 was the last day Gover worked at Dept. of Interior. He FAST-TRACKED the approval contrary to staff objections.

The Koi Nation avoided the normal rigorous federal recognition process that most other Tribes had to go through.

SEE THE PUBLISHED reporting below:

Now, on the last days of Sec of Interior Deb Haaland's employment, the Koi Nation may again be fast-tracked to be granted in trust the 68 acre parcel on Shiloh Road in Santa Rosa to build a casino-resort, a project that is completely inappropriate for this location surrounded by residential neighborhoods and parks and churches.

THIS LOCATION IS COMPLETELY WRONG FOR A CASINO RESORT. THERE IS NO BUFFER ZONE BETWEEN THE CASINO AND THE RESIDENTIAL NEIGHBORHOODS DIRECTLY ACROSS A 2-LANE STREET. There is NO SEPARATION of traffic from the residential neighborhoods and parks.

All the elected representatives from local to federal office have officially opposed this project. ALL THE LOCAL LEGITIMATE SONOMA COUNTY TRIBES OPPOSE THIS.

IT IS THE WRONG LOCATION. THE EIS prepared by the Koi Nation does not provide a complete and full evaluation of the adverse environmental impacts. The incomplete, partial and biased assessments do not consider the residential neighborhoods that surround the parcel.

Because there is NO BUFFER ZONE between the casino and the residential neighborhoods and parks, the adverse environmental impacts CANNOT BE MITIGATED as suggested by the EIS. The EIS does not consider the significant increase in residential population in the adjacent area based on two new large apartment complexes along East Shiloh Road, just across the street from this parcel. The EIS is deficient in its analysis of detrimental impact and lack of appropriate mitigation.

The presentation by the Koi Nation is misleading and based on fake background images that do not reveal the residential neighborhoods directly across a narrow two-lane road that provides the main access to the residential neighborhoods along Faught Road, leading to Shiloh Regional Park, Larkfield, and Mark West. East Shiloh Road is the main access to Shiloh Estates, Mayacama Golf Course, and to the Chalk Hill residences.

Also, this location is only 15 minutes drive from Graton Rancheria in Rohnert Park and only 15 minutes drive from River Rock Casino. Santa Rosa does not need 3 casino resorts in such close proximity, and the detrimental impact of this project will forever ruin the area.

So much destruction of property values, quality of life, environmental assets and aesthetics will result if the BIA/ Dept of Interior allow the parcel to be taken in trust. If allowed to be built, the casino resort will become a blight and by its own construction will destroy all the "Sonoma Wine Country" appeal for those travelling within the SCENIC CORRIDOR. There will be no appeal for tourists to choose this location over Graton Rancheria Casino Resort or River Rock. It will be doomed to fail because it is THE WRONG LOCATION.

Please DO NOT APPROVE this project for this site. IT IS COMPLETELY WRONG.

CBelden
resident Shiloh Road

From: kst@sonic.net <kst@sonic.net>
Sent: Thursday, November 28, 2024 4:53 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments Koi Nation Shiloh Casino Resort

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Secretary Deb Haaland
Secretary of the Interior
1849 C Street NW
Washington, DC 20240

November 9, 2024

RE: Opposition to the Koi Nation Shiloh Casino Resort proposal, a location surrounded by Santa Rosa and Windsor California RESIDENTIAL NEIGHBORHOODS with elementary, middle and high schools, churches, and two adjacent neighborhood parks, Shiloh Regional Park and Esposti Park across the street.

Summary message: **Do NOT allow this proposal to proceed** - take SERIOUSLY the opposition to this proposal from ALL the elected representatives of this area, the public opposition formally submitted over the past several years, and the opposition to this proposal by the local Tribes whose claims to Santa Rosa have been formally and fully verified, unlike the Koi Nation.

The recent election has clearly demonstrated that the current administration did not listen to the concerns of the public over many important issues. The press have misrepresented issues about this project. Furthermore, the main parties providing financial support to this project are NOT from this area or California.

This project location is completely WRONG because a casino resort has NO PLACE immediately next to and surrounded by residential neighborhoods. Since the Koi Nation purchased the small 68-acre parcel, several large apartment complexes have been developed which has significantly increased the residential population in the area. The conditions have changed since the Koi Nation first proposed this project.

There is NO OTHER Indian casino resort in California that is located on a small parcel completely surrounded by residential neighborhoods. NOT ONE. The detrimental impact on the people living here will be overwhelming and forever destroy the natural resources which make this area special.

This location is only 15 minutes drive from Graton Rancheria Casino Resort in Rohnert Park, located in a commercially zoned area and separated from the residential areas by Highway 101, which is 8 lanes wide lined by commercial development. The traffic to the casino resort does not overlap with traffic to the residential areas. This is by design and is true for the other large casino resorts in Northern California. The other resort 15 minutes away from the Shiloh parcel is River Rock Casino, also not surrounded by or adjacent to residential neighborhoods. Why does this small area need 3 large casino resorts along a 30 mile stretch of Highway 101? It is TOO MUCH. There is no other area in California with this density of casino resorts.

The problems this project will bring to the people living here are significant and cannot be mitigated because the parcel is small and completely surrounded by residential neighborhoods. The many problems that this project will bring to the area are TOO GREAT: the traffic problems, increased risks to public safety, detrimental impact on quality of life, natural resources, the environment, and very real risk of loss of life when the next wildfire extends to this area as it did in 2017 and 2019 because emergency evacuations will be compromised by traffic congestion and the inability of emergency response vehicles to reach the area.

This project will cause significant HARM to the people living here. This is NOT an overstatement of risks. All the elected representatives, the local Tribes, and the residents living here OPPOSE this project.

How can you disregard the facts that have been presented and the opinions of all these people?

Respectfully,

Carrie B.

*Shiloh Ridge Rd
Santa Rosa, CA 95403*

From: julie edwards <jedwards3146@gmail.com>
Sent: Thursday, November 28, 2024 5:26 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] "FEIS Comments, Shiloh Resort and Casino Project"

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs

Dear Mr.Broussard,

All the while, the KOI nations along with the Chickasaw Natives of Oklahoma has previously tried to get land under trust to open a Casino in Solano and Alameda Counties, so is this not obvious, "Casino Shopping at its best". This is problematic in so-many ways, it is clear to me that the department of the Interior Affairs is ignoring tribal, local, state, and federal affairs. Is this the year 2025 the point of no return for indigenous people? If you allow tribes to start a cycle of your land is now "bought" to be our land for a Casino, We are repeating the actions of history and white mans greed. It is only the true Native American Indian who can stop this plague! We take pride in our history and don't lie about our ancestors, where they lived and the land they worked. These true Native Nations, communities, families, already are fully established and have our hearts and memories firmly established where our ancestry people loved for hundreds of years and now we can continue to show our respect and honor to the very land they roamed and in turn we can now serve to protect their history and not let it be exploited by peoples who have not cared for nor have live on this land. Is It the goal of the Bureau of Indian Affairs to be coming together for the benefit of Non-Native Americans, politics and money! Please let me be wrong, and stop KOI nation from imposing on a land that was not in their heritage or in accordance with the regulations already stated.

Sincerely,

Julie Edwards
3148 North Canyon Rd
Camino, Ca 95709

"FEIS Comments, Shiloh Resort and Casino Project"

From: Debra Lopez <pamperedfeline@yahoo.com>
Sent: Saturday, November 30, 2024 12:11 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] "FEIS COMMENTS,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;

I'M WRITING TO REQUEST THAT THE KOI NATION, SHILOH AND RESORT AND CASINO PROJECT NOT BE APPROVED.

I'M A ELDER FROM THE POMO /WAPPO TRIBE AND I BELIEVE THAT THE KOI NATION MUST STAY WITHIN THEIR TERRITORY AND NOT INFRINGE ON OTHER POMO NATIONS LAND.

THE KOI NATION **FALSELY CLAIMS** THAT OUR SOUTHERN POMO LAND IS PART OF THEIR ABORIGINAL TERRITORY EVEN WHILE CURRENTLY GIVING TOURS OF THE ANDERSON MARSH IN LAKE COUNTY, AND DESCRIBING TO PEOPLE HOW LAKE COUNTY REGION **IS THEIR HOME. ABORIGINAL HOME.**

I BELIEVE IF THIS PROJECT IS APPROVED THAT IT WILL NEGATIVELY EFFECT THE DRY CREEK POMO NATION, AS THIS LAND IS THE LAND OF THEIR ANCESTORS. THE DOI **HAS NEVER TAKEN LAND INTO TRUST** FOR A TRIBE FURTHER THAN 15 MILES FROM ITS ABORIGINAL TERRITORY OR **FROM WHERE IT'S FIRST U.S. ESTABLISHED RESERVATION WAS LOCATED.** THE KOI NATION IS SEEKING TO TAKE LAND INTO TRUST **59 MILES** AWAY FROM IT'S ABORIGINAL TERRITORY. **THIS ILLEGAL LAND GRAB** IS NOT LIMITED TO THE KOI -THE SCOTTS VALLEY POMO, **ALSO FROM LAKE COUNTY** IS SEEKING TO TAKE LAND INTO TRUST IN VALLEJO, WHICH IS **WINTUN TERRITORY**, OVER 60 MILES FROM SCOTT'S VALLEY TERRITORY IN LAKE COUNTY. KOI. BY THE WAY ATTEMPTED TO **TAKE LAND INTO TRUST IN 2012** NEXT TO THE OAKLAND AIRPORT **CLAIMING THEY HAD A " DEEP CONNECTION TO THE LAND"** ALSO CLAIMING THAT THEY WORKED FOR GENERAL VALLEJO.

IT IS EVIDENT THAT IF THE 15 MILE PRECEDENT IS BROKEN AND TRIBES CAN MUDDLE WHAT CONSTITUTES A " DEEP CONNECTION TO THE LAND " A NEW PRECEDENT WILL BE SET WHEREBY, AS A RESULT OF OUR SPANISH MEXICAN, AND EARLY AMERICAN HISTORY, **WE AS CALIFORNIA INDIAN PEOPLE WILL BE ABLE TO MAKE CLAIMS JUST ABOUT EVERYWHERE TO ESTABLISH TRUST LAND AND BUILD CASINOS ON EVERY STREET CORNER IN THE STATE OF CALIFORNIA-AND EVERYWHERE ELSE IN THE COUNTRY FOR THAT MATTER.** I ASK THAT YOU PLEASE CONSIDER ALL THIS WHEN MAKING YOUR DECISION, BECAUSE ITS NOT WHAT CALIFORNIANS WANT AND THIS WILL DEEPLY HURT OTHER CALIFORNIA TRIBES, INCLUDING DRY CREEK AND GRATON TRIBES **AND WILL CHALLENGE OUR SOVEREIGNTY IN THE FUTURE.**

WE HAVE FOLLOWED THE RULES AND KOI NATION AND SCOTT'S VALLEY **MUST DO THE SAME FOR ALL AMERICAN INDIAN PEOPLE.**

PLEASE TAKE THIS INTO CONSIDERATION !
SINCERELY, DEBRA LOPEZ
DRY CREEK POMO, ELDER
415-580-8887

From: John Stobel <johndstobel@gmail.com>
Sent: Saturday, November 30, 2024 3:50 PM
To: admin@shilohresortenvironmental.com <admin@shilohresortenvironmental.com>
Cc: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Re: Notice of Availability for Final Environmental Impact Statement

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If this goes thru sonoma county is doomed ,maybe think about bringing legitimate business to the area because you have already screwed up traffic in the that intersection.

On Thu, Nov 21, 2024,

8:47 PM admin@shilohresortenvironmental.com <admin@shilohresortenvironmental.com> wrote:
Please find attached the Notice of Availability of a Final Environmental Impact Statement and Final Conformity Determination for the Koi Nation of Northern California's Proposed Shiloh Resort and Casino Project.

NEPA-related documents and notices can be found at <https://www.shilohresortenvironmental.com/>. For additional information, please contact Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, Pacific Region, at (916) 978-6165 or by email at chad.broussard@bia.gov.

From: Richard zolli <richard.zolli@att.net>
Sent: Sunday, December 1, 2024 9:48 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi casino project

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Mr. Broussard: As a Santa Rosa resident, I wish to express my objection to the land grab of the Koi Nation to build a casino. Native, historical land should be just that, not land taken in order to operate another gambling establishment. If you truly want to be keepers of the land then don't exploit it or communities around it. The location has always been residential and even more so with complex on the opposite corner of this project. We have been through devastating fires and know the reality of people not having a way to evacuate. My family sat in a traffic jam for 2 hours not being able to move during the Tubbs fire. I live fairly close to the proposed site. I would hate see people stuck on Shiloh and Old Redwood HWY not being able to move. Traffic on a daily basis is a concern also....2 lane road is not going to be able to handle traffic...so the next thing they will want to do is widen the roads....again destroying Sonoma County rural lifestyle. It is truly the wrong location and use for that property. Lake County....their home territory...seems a better option. Thank you, Mary Ann Zolli

From: Stefan and Kathy Parnay <skparnay@sonic.net>
Sent: Sunday, December 1, 2024 11:07 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Chad, Environmental Protection Specialist of the Bureau of Indian Affairs,

We are writing again to voice our concerns about the Koi Nation's proposed projects for the Shiloh property. Our many previous emails specifically outline our argument and address specific issues with the EIS, but we are compelled to reach out one more time. As residents living within 1/2 mile from the proposed site, we ask you to please deny the Koi Tribe's Resort and Casino project.

Since the Koi Tribe announced to build their large casino/events center on the corner of Shiloh Road and Old Redwood Highway, many issues have been raised ranging from increase in traffic, crime, noise, water needs, to the extremely serious concern of the inability to guarantee evacuation safety in the event of wild fires that have already proven to be a reality in this area.

What strikes us as most disturbing is that anyone would believe that a site located across the street from hundreds of residential homes, a small neighborhood park and a large regional park that are both heavily used by the local community, and two churches would be an appropriate location for a large casino/events center. There is absolutely no way that a project of this magnitude would not negatively impact the local community. The local, state, and federal government representatives are all against the Koi's projects. The surrounding neighborhood of families and residents are all against the project. What more needs to be said?

The EIS minimizes the negative impact of the mitigations needed in order to fit a casino/event center right next door to a family focused community. On paper, it looks like bandaids and duct tape are being used to minimize the reality of how the project does not fit this location. Please take a look at the Graton Resort & Casino in Rohnert Park, now imagine that project fitting on the Shiloh property. It would overshadow the area and completely and permanently eliminate the quiet, peaceful environment we live in. We believe the Koi Tribe's lack of acknowledging this reality speaks volumes to their selfishness, lack of integrity and greed. The act of giving the Koi Tribe sovereignty over this land in order to right old wrongs will destroy our family orientated community. Is a casino/events center more important than preserving our local neighborhoods?

Lastly, we are wondering why it is not being discussed about how the Chickasaw Nation - who is partnering with the Koi Tribe to provide the resources for their project and has no ties to California - would profit significantly from this deal. It has not gone unnoticed that the small Koi Tribe only has 90 members versus the over 80,000 members that make up the Chickasaw Nation. The Koi Tribe clearly lacks the resources to build, manage and run a project of this type and size.

We will continue to fight to protect our local community and way of life. The Koi Tribe's project is clearly inappropriate for our neighborhood. Please do not approve their plans.

Thank you for your time and consideration,
Stefan and Kathy Parnay

From: Kona Santana <donwaha333@gmail.com>
Sent: Sunday, December 1, 2024 2:35 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] "Feis comments, Shiloh resort and casino project "

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TO WHOM IT MAY CONCERN;

I'M WRITING TO REQUEST THAT THE KOI NATION, SHILOH AND RESORT AND CASINO PROJECT NOT BE APPROVED.

I'M A MEMBER FROM THE DRY CREEK POMO /WAPPO TRIBE AND I BELIEVE THAT THE KOI NATION MUST STAY WITHIN THEIR TERRITORY AND NOT INFRINGE ON OTHER POMO NATIONS LAND.

THE KOI NATION FALSELY CLAIMS THAT OUR SOUTHERN POMO LAND IS PART OF THEIR ABORIGINAL TERRITORY EVEN WHILE CURRENTLY GIVING TOURS OF THE ANDERSON MARSH IN LAKE COUNTY, AND DESCRIBING TO PEOPLE HOW LAKE COUNTY REGION IS THEIR HOME. ABORIGINAL HOME.

I BELIEVE IF THIS PROJECT IS APPROVED THAT IT WILL NEGATIVELY EFFECT THE DRY CREEK POMO NATION, AS THIS LAND IS THE LAND OF THEIR ANCESTORS. THE KOI HAS NEVER TAKEN LAND INTO TRUST FOR A TRIBE FURTHER THAN 15 MILES FROM ITS ABORIGINAL TERRITORY OR FROM WHERE IT'S FIRST U.S. ESTABLISHED RESERVATION WAS LOCATED. THE KOI NATION IS SEEKING TO TAKE LAND INTO TRUST 59 MILES AWAY FROM IT'S ABORIGINAL TERRITORY. THIS ILLEGAL LAND GRAB IS NOT LIMITED TO THE KOI -THE SCOTTS VALLEY POMO, ALSO FROM LAKE COUNTY IS SEEKING TO TAKE LAND INTO TRUST IN VALLEJO, WHICH IS WINTUN TERRITORY, OVER 60 MILES FROM SCOTT'S VALLEY TERRITORY IN LAKE COUNTY. KOI. BY THE WAY ATTEMPTED TO TAKE LAND INTO TRUST IN 2012 NEXT TO THE OAKLAND AIRPORT CLAIMING THEY HAD A " DEEP CONNECTION TO THE LAND" ALSO CLAIMING THAT THEY WORKED FOR GENERAL VALLEJO.

IT IS EVIDENT THAT IF THE 15 MILE PRECEDENT IS BROKEN AND TRIBES CAN MUDDLE WHAT CONSTITUTES A " DEEP CONNECTION TO THE LAND " A NEW PRECEDENT WILL BE SET WHEREBY, AS A RESULT OF OUR SPANISH MEXICAN, AND EARLY AMERICAN HISTORY, WE AS CALIFORNIA INDIAN PEOPLE WILL BE ABLE TO MAKE CLAIMS JUST ABOUT EVERYWHERE TO ESTABLISH TRUST LAND AND BUILD CASINOS ON EVERY STREET CORNER IN THE STATE OF CALIFORNIA- AND EVERYWHERE ELSE IN THE COUNTRY FOR THAT MATTER.

I ASK THAT YOU PLEASE CONSIDER ALL THIS WHEN MAKING YOUR DECISION, BECAUSE ITS NOT WHAT CALIFORNIANS WANT AND THIS WILL DEEPLY HURT OTHER CALIFORNIA TRIBES, INCLUDING DRY CREEK AND GRATON TRIBES AND WILL CHALLENGE OUR SOVEREIGNTY IN THE FUTURE.

WE HAVE FOLLOWED THE RULES AND KOI NATION AND SCOTT'S VALLEY MUST DO THE SAME FOR ALL AMERICAN INDIAN PEOPLE.

PLEASE TAKE THIS INTO CONSIDERATION !
SINCERELY,
DRY CREEK , TRIBAL MEMBER

, or

Kona Waha Santana
Owner/operator
Tribe Seed Health & Wellness
707-318-7723

From: Lauren Sloan <stylinnsr@gmail.com>
Sent: Monday, December 2, 2024 11:27 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Resort-casino project is so wrong!!!

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Chad Broussard
Environmental Protection Specialist, Bureau of Indiana Affairs

My name is Lauren Sloan and I live in unincorporated Santa Rosa California, 2 miles from the Koi Resort Casino Project currently up for approval.

I understand this is the last public comment opportunity prior to the decision to move forward on the project.

I am adamantly opposed to the Koi casino project as it would impact the community in so many negative ways; traffic, noise, pollution, overuse of water and other local resources, potential increase in crime, wildfire risk corridor, to name a few. There is nothing positive about it for the community!!! It is shocking that anyone would think of putting a casino in the middle of a pristine green space adjacent to a long time family neighborhood, a city park, and county park. It is horrific for the families of Windsor impacted by this grotesque massive resort /casino. Please pass on my concerns. Thank you for your attention.

Lauren Sloan
5025 Deerwood Drive
Santa Rosa, CA

From: Lauren Sloan <stylinnsr@gmail.com>
Sent: Monday, December 2, 2024 11:34 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comment, Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Chad Broussard
Environmental Protection Specialist, Bureau of Indian Affairs

My name is Lauren Sloan and I live in unincorporated Santa Rosa California, 2 miles from the Koi Resort Casino Project currently up for approval.

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I am adamantly opposed to the Koi casino project as it would impact the community in so many negative ways; traffic, noise, pollution, overuse of water and other local resources, potential increase in crime, wildfire risk corridor, to name a few. There is nothing positive about it for the community!!! It is shocking that anyone would think of putting a casino in the middle of a pristine green space adjacent to a longtime family neighborhood, a city park, and county park. It is horrific for the families of Windsor impacted by this grotesque massive resort /casino.

Please pass on my concerns. Thank you for your attention.

Lauren Sloan
5025 Deerwood Drive
Santa Rosa, CA

From: Jack Howard <jhoward@steelpartners.com>
Sent: Monday, December 2, 2024 3:54 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr Broussard, we live at 6181 Cottage Ridge Road Santa Rosa CA 95404. This property is directly past the proposed area for the new casino. The Shiloh Road is the main road to evacuate if there is a fire. We have lived through two fires that came very close to our house and had to evacuate twice. Since those fires there are two new high rise apartment buildings going up on Shiloh Road that will greatly increase the traffic on this main artery to Highway 101. I do not know how adding a project as large as this to this 2-lane road could accommodate a high risk event like another fire or earth quake.

Additionally, there is no insurance available from commercial insurers which should confirm this is a high-risk fire zone.

And we are concerned about the crime, water usage, noise, and other risks associated with this type of business in a neighborhood.

With all the public officials voicing that they are against this, as well as the other Indian tribes in Sonoma County, I think this project should be killed

Sincerely,

Jack Howard
Steel Partners Holdings LP
2127679954

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From: marcia singer <marcia.lovearts@gmail.com>
Sent: Monday, December 2, 2024 4:22 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS report on Shiloh Casino and Resort Project

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Mr. Broussard,

My voice is raised again, I confess, a 79 year old elder's plea, do NOT approve this project, fraught with dangers to ALL us living creatures in the vicinity.

You've received, I'm sure, letters of protest from local tribes already running gaming operations, who claim this turf: you've heard from every concerned politician from Gov. Newsom to the Mayor of Windsor, and a retired fire chief from Santa Rosa, iterating ALL the areas of concerns, from wild fire evacuations and traffic congestion making local lives at best inconvenienced, and at worst, endangered --to watershed issues, supply, pollution, overflow; increased crime, theft, DUI, strangers canvassing semi-rural region, and disrupting nearby Park visitors, Little League teams, small businesses ---and what about all the construction NOISES? Displacement of wildlife?

Anyone who actually comes here, stands on the turf, immediately knows this is the WRONG HOME for such an enterprise. The only people who want it seem to be the corporate backers, the KOI, and a few local carpenters, hoping for work.

I'm 100% in favor of the KOI finding an appropriate home for their interests... very sorry they chose this location. I LIVE ACROSS THE ROAD, .3 OF A MILE AWAY.
Every aging person (there are many of us) nearby is scared, alongside young parents, and frankly, I've not met a single person in the area in favor...

URGING YOU PLEASE, "NO!" to this FEIS.
Marcia Witrogen, 630 Colonial Park Dr, Santa Rosa CA 95403
8183313153

From: m henry <michhenrypatrick@yahoo.com>
Sent: Tuesday, December 3, 2024 7:06 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Re: Casino on Old Redwood Hwy & Shiloh, Windsor, CA

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>

> I have written previously regarding proposed Casino. Concerns about increased traffic on a two lane hwy already impacted by the building of a Huge apartment complex on the corner of Shiloh & Old Redwood Hwy. occupants will no doubt park along the hwy as do occupants of a complex just north of this monstrosity. Where is all the water for such proposed developments in an already drought declared town? This is the main evacuation route in case of emergencies such as we experienced in 2017; and 2019 during major wildfires which made evacuation mandatory. Who has done an environmental impact survey and what are our city planners and elected officials thinking regarding this much growth in this little town? We do not want or need a casino along with these apartment complexes already being built. To re-iterate, parking, congested traffic, depleted water reserves and influx of people coming to gamble in yet another casino in Northern California. The ENvironmental Impact Survey was done long before numerous new building projects have started along Old Redwood Highway. These sites will also bring increased traffic, parking issues and water shortages. Windsor city officials had promised to keep new growth to a minimum.

Once again I am protesting the proposed Casino on Shiloh and Old Redwood Highway.

> Michelle Henry

>

> Sent from my iPad

From: Sharon Conley <sjcon1951@yahoo.com>
Sent: Tuesday, December 3, 2024 10:00 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Fw: NO CASINO IN WINDSOR

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To reiterate please see my earlier comments from March 24, 2024.
Thank you,
Sharon Conley
233 Burgundy Road
Healdsburg, CA 95448

[Sent from Yahoo Mail on Android](#)

----- Forwarded Message -----

From: "Sharon Conley" <sjcon1951@yahoo.com>
To: "Sharon Conley" <sjcon1951@yahoo.com>
Sent: Sun, Dec 1, 2024 at 12:52 PM
Subject: Fw: NO CASINO IN WINDSOR

[Sent from Yahoo Mail on Android](#)

----- Forwarded Message -----

From: "Sharon Conley" <sjcon1951@yahoo.com>
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>
Sent: Wed, Mar 27, 2024 at 9:41 AM
Subject: NO CASINO IN WINDSOR

Good day,

My daughter lives just off Shiloh Road. She travels twice a day past where the casino would be to take and pick up her daughter to and from Sam Miguel School.

My son lives one mile from where casino would be, Shiloh Road west of 101. His two sons attend Maddy Washburn. His daughter is in childcare with my daughter.

The congestion is horrendous from 101 at Shiloh Road through Old Redwood Hwy in all directions a large part of the day, especially at peak hours.

As the new affordable housing along Shiloh east is occupied the traffic will be more congested and opens the door to more accidents.

On another note, when speaking with friends, family and acquaintances I have yet to have one person who is for the casino, hotel, and other amenities planned there.

There are two other casinos in very close proximity. Rohnert park is closer for gamblers coming from the south and only a short jaunt from there to go to Geyserville. It makes no sense to add one in Windsor. There is a casino in Lake county for gamblers coming from the north.

Casinos also add a temptation for young adults to gamble away their hard earned money and become addicted to gambling. In turn they may turn to large credit card debt in order to pay for the necessities of life.

A big concern for all is the fact that not all gamblers will be delivered by bus. Those who drive will likely be driving and leaving the casino at varying degrees of intoxication. Air pollution in the area will go up.

Casinos draw a lot of other bad influences to the area. Without touching on those, we know what they are.

This is a beautiful and rural area. Do not destroy it. Please, no casino on Windsor.

Thank you,

Sharon Conley
233 Burgundy Road
Healdsburg, CA 95448

[Sent from Yahoo Mail on Android](#)

From: Chris Thuestad <chris2esta@comcast.net>
Sent: Tuesday, December 3, 2024 4:29 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

The Koi Nation bought a 68-acre property near Windsor, in Sonoma County, CA and announced its intentions to open a new casino there. I am deeply concerned about this for a number of reasons and feel very strongly that this should not be allowed to happen.

I've written several letters in protest of this project. I'm gratified that even the Governor of California, Gavin Newsom, has voiced his opinion that the project should not be allowed. In his letter, written by Bryan Newland, he pointed out that according to federal law, any proposed casino must "not be detrimental to the surrounding community". This casino would be nothing but detrimental to the surrounding community!! A casino brings traffic, noise, and crime. It is immediately adjacent to neighborhoods and a church. I read somewhere that the Koi Nation proposes to pay for the neighbors to have thicker, noise-reducing windows put in their houses. What about their backyards? Are they expected to give up the peace and serenity they have now? The property values of everyone in the area will drop significantly. We've been in our home for almost 40 years. If we have to move, I can't imagine what sort of a loss we'd take on our property – probably hundreds of thousands of dollars. And then, the property taxes for a new place would probably cost at least \$1,000 a month more compared to what we pay now. We're retired; this home is our nest egg, and we're only half a mile from the proposed site. We are only one couple – multiply that by thousands of families in the area. This casino would be disastrous for all of us!

When the Graton Casino in Rohnert Park opened for business, it cannibalized 50 – 70% of the River Rock Casino's business in Geyserville according to the Press Democrat. The Koi Nation is a Lake County tribe with roots 50 miles away yet they bought land in Sonoma County just about half way between two existing casinos owned by Sonoma County tribes – and I don't think that was a coincidence. They plan to take business away from these Sonoma County casinos. There are also two other local tribes in the area that have expressed an interest in building casinos. The Koi Nation may have the right to build a casino in California, but it needs to happen on their own ancestral land in Lake County. It isn't fair to the local tribes to have to compete with them. As noted in Newsom's letter, the law states, "the restored lands exception must not be construed so broadly as to 'give restored tribes an open-ended license to game on newly acquired lands' and 'in administering the restored lands exception, the Secretary needs to ensure that tribes do not take advantage of the exception to expand gaming operations unduly and to the detriment of other tribes' gaming operations." It's almost as if this section of the Federal Law was written specifically to keep the Koi

Nation from being allowed to build a casino on this site.

The proposed site is in a high fire danger area that has been forced to evacuate for wildfires or been put on alert for possible evacuation several times in the last several years. When we had to evacuate during the Kincadee fire in 2019, my husband was at Home Depot on Shiloh -- it took him almost an hour to get back to our house which is just a mile away. According to MapQuest, it should only take 4 minutes! Adding a casino to the area with around 2,000 employees and an untold number of guests is insane. When the next wildfire goes through, people could die in their cars like the tragedy that happened in Paradise, CA. And yes, the roads could be improved, but the only way for this to happen at this site would be to bulldoze several existing homes in order to widen the road. Even then I'm not sure there would be room.

I'm also concerned about water usage. In addition to a gaming area, the proposal includes six restaurants, a spa, and a 400-room hotel. We don't have enough water for the people who are already here let alone for all these extra people. The scientific community has warned that our droughts will increase in frequency and duration. During the recent multi-year drought, we were headed to a real disaster until the rains finally came. The casino proposal shows plans to put in a 700' well and pump out a quarter of a million gallons of water *a day*. Not only will all the existing wells in the area go dry in the next drought (or before), there could be problems with ground subsidence leading to property damage. Once the land is taken into trust and the casino is built, there won't be anything anyone can do about that. We've already been told to replace our toilets, dish washers, and washing machines. We've been asked to pull up all our water-intensive landscaping. We've been required to only water our lawns on certain days each week, not to wash our cars in the driveway, and to cut our usage by as much as 20%. What's next? No showering? No yards at all? No drinking water?

No one wants to live by a casino! Everyone who lives in Windsor will be impacted by the increase in traffic, noise, and crime, and many will see a sizable reduction in their property values. We already don't have sufficient water or adequate roads. The Graton and River Rock casinos will see a significant reduction in their profits taken by a tribe from another county. Please, please do not allow the Koi Nation to build this casino in Sonoma County!!

Respectfully,

Chris Thuestad
6186 Lockwood Drive
Windsor, CA 95492

From: Stefan and Kathy Parnay <skparnay@sonic.net>
Sent: Tuesday, December 3, 2024 7:21 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Fwd: FEIS Comments, 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,

We just realized that we did not include our address on our recent email comment - see below.

We are:

Stefan and Kathy Parnay
190 Barrio Way
Windsor, CA 95492

Thank you!

Begin forwarded message:

From: Stefan and Kathy Parnay <skparnay@sonic.net>
Subject: FEIS Comments, Shiloh Resort and Casino Project
Date: December 1, 2024 at 11:07:55 AM PST
To: "Broussard, Chad N" <chad.broussard@bia.gov>

Dear Chad, Environmental Protection Specialist of the Bureau of Indian Affairs,

We are writing again to voice our concerns about the Koi Nation's proposed projects for the Shiloh property. Our many previous emails specifically outline our argument and address specific issues with the EIS, but we are compelled to reach out one more time. As residents living within 1/2 mile from the proposed site, we ask you to please deny the Koi Tribe's Resort and Casino project.

Since the Koi Tribe announced to build their large casino/events center on the corner of Shiloh Road and Old Redwood Highway, many issues have been raised ranging from increase in traffic, crime, noise, water needs, to the extremely serious concern of the inability to guarantee evacuation safety in the event of wild fires that have already proven to be a reality in this area.

What strikes us as most disturbing is that anyone would believe that a site located across the street from hundreds of residential homes, a small neighborhood park and a large regional park that are both heavily used by the local community, and two churches would be an appropriate location for a large casino/events center. There is absolutely no way that a project of this magnitude would not negatively impact the local community. The local, state, and federal government representatives are all against the Koi's projects. The surrounding neighborhood of families and residents are all against the project. What more needs to be said?

The EIS minimizes the negative impact of the mitigations needed in order to fit a casino/event center right next door to a family focused community. On paper, it looks like bandaids and duct tape are being used to minimize the reality of how the project does not fit this location. Please take a look at the Graton Resort & Casino in Rohnert Park, now imagine that project fitting on the Shiloh property. It would overshadow the

area and completely and permanently eliminate the quiet, peaceful environment we live in. We believe the Koi Tribe's lack of acknowledging this reality speaks volumes to their selfishness, lack of integrity and greed. The act of giving the Koi Tribe sovereignty over this land in order to right old wrongs will destroy our family orientated community. Is a casino/events center more important than preserving our local neighborhoods?

Lastly, we are wondering why it is not being discussed about how the Chickasaw Nation - who is partnering with the Koi Tribe to provide the resources for their project and has no ties to California - would profit significantly from this deal. It has not gone unnoticed that the small Koi Tribe only has 90 members versus the over 80,000 members that make up the Chickasaw Nation. The Koi Tribe clearly lacks the resources to build, manage and run a project of this type and size.

We will continue to fight to protect our local community and way of life. The Koi Tribe's project is clearly inappropriate for our neighborhood. Please do not approve their plans.

Thank you for your time and consideration,
Stefan and Kathy Parnay

From: Carrie <carrie@cfapromo.com>
Sent: Tuesday, December 3, 2024 8:59 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FYI - FEIS Comments, Koi Nation Shiloh Resort and Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

December 3, 2024

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

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

To Regional Director Dutschke:

I am a Sonoma County resident living in Windsor, and I VEHEMENTLY oppose the Koi Nation's casino/spa/hotel and enormous parking structure for over 5000 cars that they want to construct which is a local NEIGHBORHOOD with a park directly across the street along with many homes and a church. I tried to understand the Final Environmental Impact Statement (FEIS) and the earlier draft environmental impact statement (DEIS), but I found it difficult to understand. BUT – I found that it continues to fail to adequately address the impact this project will have on our entire community and Sonoma County. PARTICULARLY discussing the aspects of fire and also drought.

I have written SO MANY letters and emails and attended the meetings and phone calls but I am SO frustrated. The Bureau of Indian Affairs (BIA) is NOT listening to the concerns of our community and the concerns of other tribes who already live here and have casinos. I honestly cannot believe we are at this point and that this KOI PLOY hasn't been scuttled. Maybe it's the big \$\$ sunk in by the Chickasaw nation who could care less about our community and the ACTUAL TRIBES who are from our county and are also against this casino being built where the KOI HAVE NO ROOTS and no HERITAGE to this land or community.

Massive opposition exists at every level—from the state down to individual neighborhoods. Sonoma County and the Town of Windsor have raised critical concerns regarding water supply, wastewater management, traffic congestion, wildfire risk, and evacuation routes, law enforcement and public safety, housing, and broader economic impacts. Local indigenous tribes have also highlighted the profound and harmful effects this project will have on their cultural resources. Despite these serious concerns, the BIA has failed to address them adequately, and many mitigation measures outlined in the FEIS are vague, framed merely as "best management practices" without any enforceable guarantees. I have seen them address the fires with having people help to clear the parking lots. It's a joke – clearly none of these people have ever experienced fires as we have. We have had to evacuate twice in recent years. My own home in

Windsor was damaged and I was out of my home for months. When we evacuated there was SO much traffic to get out. I cannot imagine another 5000 plus cars trying to get to our ONE highway. I have said in numerous other letters I have sent – just like LAHAINA – if we are sitting in our cars and we can't get out and we burn up – I hope my family sues the hell out of the BIA because we are warning you now. This is a BAD idea. This is a high fire risk area. State Farm insurance has recently cancelled almost all policies in Windsor. There is a reason. And now you want to put thousands more people here to clog up our roads, use our water and take away business from other native tribes casinos – 2 within 15 minutes north and south of Windsor. This is just pathetic that this has gone on and on and on. All in the name of greed and money for a tribe who has NO ROOTS here. They are NOT a Sonoma County tribe. This would set an entirely new precedent – and not a good one at that.

You have promised to consider public comments, but it is evident in the FEIS that you have not. The current process feels rushed and dismissive of the voices of those who will be directly affected. The 30-day comment period is particularly outrageous, given that it falls during the busy holiday season, effectively limiting meaningful public participation. I am so busy and have been traveling and it's been hard to find time to even put a letter together. We demand an extension of this period to allow the community sufficient time to respond thoroughly. I have not met ONE person who wants this casino. We have VERY low unemployment. It is very expensive to live here. Businesses are struggling to find workers and now you want to add another large business here in the middle of our neighborhood? Makes no sense to me.

For many years we have suffered a drought here in our county. For years my family and I took 3-4 minute showers. I took out all my plants and grass. Now this non-native tribe can come into our neighborhood and take our water – where people will be taking long showers and using the spa for showers and pools etc and taking baths (I haven't had a bath in years due to our drought)– and clearly you have NO idea how bad our water situation has been for years and years. This just kills me because people don't know how much we all understand our resources are limited and now we will have 5000 people using towels and bathrooms and showers. How can you not care about our very real concern for fire and water in this county??? We tell you over and over and it falls on deaf ears.

THIS PROJECT is in an actual neighborhood. It is a beautiful area. Lots of nature and wildlife. I ride horses across the street up and into Shiloh park. This will completely turn this lovely area and neighborhood into a dangerous area where there will be drunk drivers, people committing crimes – who knows what. Because let's just be frank – casinos don't attract the best of us. My heart aches for the people who live right there. It was very bucolic and now this.....and NO ONE from BIA is listening to all of the reasons this is the wrong place for this casino.

While we support local indigenous tribes, this project is not suitable for Sonoma County and does nothing to restore lands to the Koi Nation, whose ancestral homeland lies more than 50 miles away in Lake County. The only way to prevent the severe environmental, social, and cultural harm this project poses is for the BIA to approve the environmentally preferred "no project" alternative in the FEIS.

Sincerely,

CARRIE MARVIN
237 LA QUINTA DRIVE
WINDSOR CA

From: Kim Edwards <kimmarieed@comcast.net>

Sent: Wednesday, December 4, 2024 9:27 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Here is my letter opposing the Casino project on Shiloh Road in Sonoma County

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

December 4, 2024

Subject: EIS Comments, Koi Nation Shiloh Resort and Casino

Dear Chad Broussard,

I am a Sonoma County resident, and live approximately a quarter mile from the proposed casino site. We have strongly opposed this project from the beginning, as it will effectively desecrate the land the Koi was so pleased to purchase. I remember seeing a spot on TV after the acquisition of the property where a Koi representative said it felt "surreal" as they strolled the stately oaks, babbling creek and surrounding vineyards on a beautiful fall day. It is unconscionable that they would turn this land into a casino. Doing so will greatly affect the lives of those in the immediate vicinity of the project (Our Community Matters) as well as the wildlife in Shiloh Park, and the larger communities of Windsor and Santa Rosa alike.

I do not believe our efforts to stop this project have been heard by the Bureau of Indian Affairs. They do not seem to be taking our concerns seriously. This process has not felt fair to me or our community. To me it feels more like an exercise we have been asked to repeat over and over with no real response to our very serious concerns. I believe it would be different if any one of you actually lived in this neighborhood.

I know (or hope) you have read our concerns regarding water supply, wastewater management, traffic congestion, wildfire risk and evacuation routes, but I don't feel you have really *heard* them. This has been a huge disappointment. I do not feel our community matters as far as the BIA is concerned. It feels a little like we are being treated the way the people you protect are fighting against. A casino in this neighborhood is just wrong on so many levels, yet no one is listening.

It is my hope that you will take our concerns to heart and not grant this land to the Koi to build the project they have proposed.

Sincerely,

Kim Edwards
5833 Mathilde Drive

Windsor, CA 95492

From: Padi Selwyn <padi6024@comcast.net>
Sent: Wednesday, December 4, 2024 12:53 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Public Comment Koi Nation Casino Project, Windsor, California

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

Attached please find a letter of public comment regarding the Koi Nation Casino Project.

Thank you for your attention.

Padi Selwyn

Co-chair - Neighbors to Preserve Rural Sonoma County



December 4, 2024

Dear Mr. Broussard:

Preserve Rural Sonoma County and its 3,000 member/followers are writing to you with our strong opposition to the Koi Nation's proposed hotel and casino gaming development. The Final Environmental Impact Statement (FEIS) released in November fails to adequately address the egregious impacts this project will have on the neighborhood and Sonoma County.

Residents have shared their critical concerns regarding water supply, wildfire risk and evacuation routes, traffic, and law enforcement and public safety impacts, yet the Bureau of Indian Affairs appears to be ignoring community concerns. There is overwhelming opposition to this project, even by our Governor.

Even local indigenous tribes have voiced how this project would have harmful impacts on their cultural resources. Yet community concerns have been ignored and the mitigation measures outlined in the FEIS are ambiguous, without any enforceable guarantees.

We are respectfully requesting that this ill-conceived development be rejected by the BIA, as it would have disastrous effects on the public safety and quality of life of our community.

Thank you for your consideration.

Sincerely,

Padi Selwyn, Co-Chairs
Preserve Rural Sonoma County

From: erin clark <erinclark10@gmail.com>
Sent: Wednesday, December 4, 2024 3:18 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, 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,

There are MANY reasons my husband and I are against the proposed Koi Nation casino in rural Windsor, CA and I and many others have written to you several times already regarding our stand. I'm not going to repeat myself again. I've read over the EA reports and even though I am not an environmental expert it is easy to see that words can be used, massaged and manipulated to get what one wants. That is exactly what the Koi Nation and their wealthy backers are doing. Please reject their request for a casino in our rural neighborhood. Your work title is 'Environmental Protection Specialist', please make sure to help protect our lovely rural area and neighborhood from this unwanted and unneeded development.

Sincerely,
Erin E. Clark
825 Leslie Road
Healdsburg, CA 95448
707-953-7034

From: Carol Rash <rashcarol@yahoo.com>
Sent: Wednesday, December 4, 2024 8:40 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Impact of Koi Casino

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To Chad Broussard,

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. Since that evacuation, several low cost housing large apartment buildings have been added along Old Redwood Hwy near the proposed site and there will be many more residents to evacuate. If the Casino has to be evacuated that would add to traffic jams and possibly cost lives.

We have complied with water restrictions during several 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.

We are strongly opposed to having this Casino built.

Sincerely,

Carol Rash
Sent from my iPad

From: Jill Plamann <jillplamann@gmail.com>
Sent: Wednesday, December 4, 2024 10:45 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Koi Nation Shiloh Resort and Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

December 4, 2024

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

Dear Regional Director Dutschke

I have lived in the neighborhood of the proposed casino for 30 years. Please do not place a casino on this important land. I strongly oppose it for the following reasons:

This narrow path from Shiloh Regional Park towards the ocean is an open space that houses a habitat for our declining pollinators and wildlife. It should remain an open space for sure.

I believe you will be sorry if you build here because the land is too SMALL for your project. It would be squeezed between residential neighborhoods. It will not fit in. Traffic would be an absolute nightmare.

This proposed entertainment facility would draw in thousands of people looking for drugs, prostitution, and..... gambling!!!! Do your research.... The Town of Windsor is ecologically responsible and a leader in protecting our environment in every way possible as we move forward. This project would be a fire danger and a living nightmare when people need to evacuate.

This huge, dangerous commercial development would be located walking distance to elementary schools, churches, parks, and established neighborhoods. It makes absolutely no sense to put a Casino here!

I strongly believe that the Native American culture and knowledge is extremely important and vital to the survival and reclamation of our planet. We need this sensitivity more than ever and I sincerely wish that this knowledge can be put to good use rather than wasted on the well-known illnesses caused by casinos.

I believe a scientific or spiritual center would be welcomed in our community. Show off your culture with pride. Teach us! PLEASE!

The proposed casino will never be welcomed in our neighborhood.

Jill Plamann
112 Anna Drive
Windsor, CA. 95492

From: Steve Plamann <shplamann@comcast.net>
Sent: Wednesday, December 4, 2024 10:44 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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To Whom it may concern,

My letter regarding: "NOI Comments, Koi Nation Fee-to-Trust and Casino Project"

Shiloh Neighborhood Church is across the street & Christ Evangelical Lutheran Church is just down the block from the proposed site of the Koi casino complex.

San Miguel Elementary School is less than one mile from the proposed Koi casino.

The Tubbs and Kincade fires burnt to Faught Rd, the eastern boarder of the Koi property. Only the existing vineyards stopped it from burning into Windsor during both those fires. A large structure, with a hotel, event center and casino complex, would very likely have caught fire and spread both those fires into neighborhoods and possible all of Windsor.

This proposed nightmare casino complex will generate more traffic congestion on Shiloh Road, a two lanes road, already over-crowded all the way to the freeway.

It is across the street from Esposti Park, where kids play baseball and soccer and take their younger kids to play.

Casinos cause a large increase in many crimes that are not welcome in Windsor. We raise kids here. Old folks retire here.

The Casino will cause major environmental damage and greatly increase water run-off from this designated agricultural land.

Steve Plamann (in our 30th year of living here and want to retire here).
112 Anna Drive
Windsor, CA 95492

From: Therese Menzel <tcmarzel@gmail.com>
Sent: Thursday, December 5, 2024 8:48 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Shilo Resort and Casino Project

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Dear Mr. Broussard,

I am opposed to the Shilo Resort and Casino Project. I live off of Shilo Road, across the freeway from the location. Shilo Road and Old Redwood Highway are both one-lane roads and there is currently congestion during morning and afternoon school and work commutes.

There is an existing large apartment complex and a new apartment complex that is ready to open on the corner of Shilo Road and Old Redwood Highway. Homes and a church that serves the need of our community are across the street from the proposed development. The traffic and congestion would directly impact the existing and future occupants of dwellings.

I would oppose any development on the property on the corner of Shilo Road and Old Redwood Highway because of traffic congestion and disruption to home owners and apartment renters. Additionally there is a large city park where children's sports are played directly across Shilo Road from the proposed development.

Thank you.

Sincerely,

Therese Menzel

1445 Golf Course Drive
Windsor, CA 95491
415-497-7481

From: reuben weinzveg <sonomacountytomorrow@gmail.com>
Sent: Wednesday, December 4, 2024 1:32 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, 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:

I am forwarding the letter about the Shiloh Resort Casino Project as I feel the information is important. Please include this letter in the public record for comments due December 23, 2024.

Sincerely,
Reuben Weinzveg, Treasurer SCT

December 3, 2024

Our organization supports local indigenous tribes, yet the Koi Nation's proposed hotel and casino gaming project slated for the town of Windsor, is completely unsuitable for Sonoma County and the small residential neighborhood where it would be located.

Our community, including residents, Board of Supervisors and even Governor Newsome, have voiced critical concerns regarding traffic congestion, wildfire risk and evacuation, water supply, law enforcement and public safety, housing, and other economic impacts.

We are asking the BIA to reject this development to prevent the severe environmental and social damage this project poses for our community and County. We urge the BIA to approve the environmentally preferred "no project" alternative in the FEIS.

Sincerely,
Reuben Weinzveg
Treasurer,
Sonoma County Tomorrow, Inc.

--

Sonoma County Tomorrow, Inc. is recognized as a tax-exempt organization under section 501(c)(3) of the Internal Revenue

From: George Woods <woods76@gmail.com>
Sent: Saturday, November 30, 2024 4:15 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Shiloh Rd Casino

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Do we really need one more casino in Sonoma County, (are 2 not enough) so we can create even more homeless people due to impoverishment by gambling addiction?

George Woods

From: Dinah Costello <haviceprin@aol.com>
Sent: Saturday, December 7, 2024 9:31 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: DINAH COSTELLO <haviceprin@aol.com>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

----- Forwarded Message -----

From: Dinah Costello <haviceprin@aol.com>
To: DINAH COSTELLO <haviceprin@aol.com>
Sent: Friday, December 6, 2024 at 01:27:18 PM PST
Subject:

Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Broussard,

I've lost track of how many letters I've sent about our Sonoma County community's vehement opposition to the Koi casino proposal, which would be build across the street from our home of 22 years. Upon reading the FEIS, I had two reactions: 1). there are so many red flags in the FEIS, this whole project will never get approved, or 2) this massive report is meant to whitewash this monstrous intrusion into our neighborhood, and we're doomed.

The issues raised about lack of infrastructure, air quality, noise, and crime, as well as the unreasonable demands on public services (police, fire, water, utilities) have been well documented. Also of note: the fires of 2017 and 2019 decimated our community, forcing mass evacuations along Shiloh Road (a narrow one-lane road that cannot be widened, casino or no). And then last month, a historic 17-inches of rain fell in a three-day period, resulting in the closure of Shiloh Road for several hours. So many red flags!

Of course, the main objections to this casino are: 1) The Koi Nation of Lake County has no history or cultural ties to Sonoma County. The five federally recognized indigenous tribes that reside here unanimously oppose the Koi's efforts to usurp their native land. And, 2)

Casinos should never be built in residential neighborhoods. Mr. Broussard, would you want a casino built across the street from your home? THIS IS THE WRONG PROJECT IN THE WRONG PLACE!

I understand that working at the BIA involves having the best interests of each tribal nation as your guiding principle. The five Sonoma County tribes deserve to have their interests protected, even if that means denying the Koi any claim to their land. Lastly, as a public servant, the BIA also has a responsibility to protect surrounding communities from projects (like casinos) that threaten their precious quality of life. No powerful tribe from Oklahoma, using a small Lake County tribe as a front, should be able to destroy what we and our neighbors have spent decades to build. After all, this is America!

Respectfully yours,

Dinah Costello
5840 Mathilde Drive
Windsor, CA 95492
707-837-2960
haviceprin@aol.com

From: betsy mallace <betsymallace@yahoo.com>

Sent: Saturday, December 7, 2024 1:27 PM

To: Dutschke, Amy <Amy.Dutschke@bia.gov>; Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation FEIS Comments, Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Sent via Email December 7, 2024
Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

SUBJECT: Koi Nation Shiloh Resort and Casino Project Comments on Final Environmental Impact Statement (FEIS)

Dear Ms. Dutschke:

I would like to submit my comments on the Final Environmental Impact Statement (FEIS) for the Koi Nation Shiloh Resort and Casino Project. The FEIS, as currently presented, is inadequate, incomplete, incorrect and/or invalid in properly addressing numerous significant environmental and community (both tribal and current) impacts. Many of my previous comments were simply ignored. For this reason, this application should be denied.

I am a Sonoma County resident and live within 2 miles of the project site. I oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated Sonoma County land adjacent to the Town of Windsor for any commercial development including but not limited to a hotel and casino gaming project.

It seems like the Bureau of Indians Affairs is rushing this process, has not adequately and thoughtfully considered the local environmental impacts, and cannot guarantee nor enforce the (limited) mitigation that is proposed. For this reason, this application should be denied.

This is the wrong location for this project and potentially, another more suitable location could be considered, but this application has cause for denial.

There is no plan or mitigation for a hazardous earthquake event. Just this week there were several earthquake events. The property is on the Rogers Creek fault zone, there is no plan in place for evacuation or safety, and no mention of how this significant impact would/could be mitigated. This is cause for this application to be denied.

There is no plan or mitigation for a hazardous flood event. The property in a noted flood plain/way, there is no plan in place for place for evacuation or safety, and no mention of how this significant impact would/could be mitigated. This is cause for this application to be denied.

There is no plan or mitigation for a hazardous loss or leak of utilities, ie : electricity or gas event. Recently, there was a gas leak, an emergency “shelter in place” was ordered for a large area surrounding the property and Shiloh Road was completely shut down to all traffic from Highway 101 to Old Redwood Highway. There is no plan in place for evacuation or safety, and no mention of how this significant impact would/could be mitigated. This is cause for this application to be denied.

The project site sits in the middle of a voter approved community separator. This parcel is voter mandated to stay "open-space". It is not mentioned, planned or mitigated in the FEIS. This oversight must be addressed. Its omission leaves open potential significant impacts and no mitigatable is mentioned. This omission is cause for denial of the application.

100% of all needed traffic improvements need to be mitigated and paid for by the tribe/project, thru 2040 plans and beyond. It is not acceptable for the tribe/project to just pay “their fair share”. All future traffic caused by this project is entirely "their share". Who allocated “their fair share”? Who manages what and when their share is paid? No where in any of the FEIS is Caltrans mentioned. Caltrans controls all sections of Highway 101, along with all entrance and exit ramps, and all associated traffic signals. Has Caltrans been contacted? Did they give approvals? Did they list impacts? Did they suggest mitigation? All of Caltrans jurisdiction has been entirely omitted for the DEIS. This omission is cause for denial of this application. FEIS has the daily trips on highway 101 listed as of accurate as of 2017, this is outdated. Current accurate data must be used. Basing traffic information on 7-year-old outdated data is cause for this application to be denied.

The validity of Acorn Environmental un-bias preparation of the FEIS is unproven and questionable. This is cause for this application to be denied.

No mention of who decides the level of impact? No mention of what criteria is being used? It is all subjective. Since no rule, guide, criteria for each level of impact have been stated, this is cause for denial of the application.

Since "Best Management Practice" has not been quantified or qualified, it is not mitigatable; it is an unfounded theory. Since every BMP mitigation statement has not been clearly listed with actionable items, this is cause for this application to be denied.

It is false that there will not be significant impact to the bicycle traffic around this project. There are significant bike routes on Old Redwood Highway, Shiloh Road and Faught Road. This omission is cause for this application to be denied.

A less than significant finding of reduction in regional property values is just false. It is not true. Local adjacent homes have already lost value with just the known possibility of a casino in a residential neighborhood. Since no data has been supplied, much less proven or mitigated, this false statement is cause for this application to be denied.

Drunk driving is listed as having a less than significant impact. Developing the property from the current agricultural vineyard to 24 hour/7 days a week alcohol serving casino hotel entertainment resort will of course have a significant increase/impact on drunk driving. Less than significant impact is a false statement. And a "policy" that will "reduce the likelihood" of drunk driving requires "no mitigation needed", is false and truly makes no sense. These false statements are cause for this application to be denied.

I support all the local, indigenous tribes. The Koi Nation have an ancestral homeland, it is in Lake County, it is not in Sonoma County. Therefore, this application should be denied based on the Koi Nation not having legal standing to move THIS parcel into fee-to-trust.

Currently, the Koi Nation is suing the County of Lake, CA to protect their ancestral rights and artifacts. Who is protecting the ancestral rights of the Lytton Band of Pomo Indians, the Federation Indians of Graton Rancheria, the Cloverdale Rancheria of Pomo Indians, Kashia Band of Pomo Indians of the Stewarts Point Reservation and the Dry Creek Rancheria Band of Pomo Indians? This project has no legal standing in Sonoma County, this is the wrong location, and the BIA cannot restore lands (which they never had any historical connection to) to the Koi Nation.

I respectfully urge the Bureau of Indian Affairs to deny the application, as it is the only option that ensures the protection of the environment, public safety, quality of life and preservation of true ancestral land rights.

With regards,

Betsy Mallace

Betsy Mallace
Windsor CA 95492

From: robertaannwagner@sbcglobal.net <robertaannwagner@sbcglobal.net>
Sent: Saturday, December 7, 2024 5:57 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] ONE CASINO IS ENOUGH!!!

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 Casino Project is an unnecessary redundancy.

Further, a second Casino would create pollution, increase crime, and create negative environmental consequences.

Make the Koi Project Passé!

Kindest regards,

Roberta Ann Wagner
STYLE DEPARTMENT

Sent from my iPhone

From: Jonathan Fernandez <every9978@gmail.com>
Sent: Saturday, December 7, 2024 6:04 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Harmful Casino Project

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I oppose a harmful casino project taking place in Windsor community. This would be a harmful proposal to the environment. The casino project would cause an increase of traffic, noise and cause environmental harm. More specifically; the established homeland before this project would struggle with this risk both economically and physically.

From: Pat Stone <1patstone@comcast.net>
Sent: Sunday, December 8, 2024 5:53 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>; Mike Stone <mike4realestate@yahoo.com>
Subject: [EXTERNAL] Shiloh Casino Problems

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Chad,

Please carefully consider the real and potential harm that building a casino on Shiloh would pose to the residents of adjacent communities.

In the Oak Grove and Savannah Way developments, we have only 2 narrow residential roads of egress onto Old Redwood Highway, and large apartment complexes already built and being built now will further obstruct our access to the only way of leaving the area.

Far more crucially, it would hinder evacuation from wildfires which have come very close to our homes twice in the last few years. **The casino would also be in grave danger of wildfires which jump from ridge to ridge, putting Koi staffers and their customers at terrible risk as there is no sufficiently large evacuation route from that site.**

Please find a less potentially catastrophic venue for the Koi people's casino. There are many large rural sites in Sonoma and Lake County that would pose less threat to the Koi casino and adjacent neighborhoods.

Thanks for your consideration to this potentially lethal decision.

Sincerely,

Patricia Stone, resident
Oak Grove community.

(707) 620-0472

From: Christy Delucchi <sewingchris46@icloud.com>
Sent: Sunday, December 8, 2024 6:23 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard,

I am writing to express my extreme concern regarding this projected project. I have lived in Windsor for over 40 years. My deceased husband and I built our home and raised 4 children here. Over the years we have watched the planned controlled growth that kept in mind the goal of family, nature and history encouraging homes that support a range of economic backgrounds and business has been a balancing act as well as supporting and maintaining the beautiful and accessible parks that add a component to the plan. Of course as towns grow there will be growing pains and hard choices to make. Carefully looking at the town goals and what each project accepted adds to a community is critical. Weighing the risks and the benefits to all is mandatory. I have watched our roads become more crowded as well as the challenges of keeping the natural beauty and family focus clash. I have been evacuated (with livestock) and saw the congestion and stress that occurred during the too frequent fires. Having the stress of climate change and drought seasons when extreme water conservation is required has become another seasonal challenge. With these facts and the input of those knowledgeable on these subjects that adding a product of this size will negatively impact this small town in a variety of ways. I am praying that those who will be deciding the outcome of our small town will not put the financial desires of one group (not directly from this area) over the wisdom of many who want a family oriented environmentally friendly town to remain so. Thank you for your time.

Christy Delucchi
6398 Old Redwood Hwy.

Sent from my iPad

From: Mike Stone <mike4realestate@yahoo.com>
Sent: Sunday, December 8, 2024 11:42 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Hid Chad,

This is one of the worst places for a casino any reasonable person could imagine. Shiloh is a narrow two-lane road already used by many to access Federal Hwy. 101 (freeway) by many residents and with the increasing wildfire hazard, it is the only safe and sensible evacuation route for too many. The increase in traffic at this location will pose a danger to residents' ability to evacuate in time and present major traffic congestion on this already well-traveled and narrow two-lane road. Shiloh Road is already taxed by traffic from many residential subdivisions, plus there are two new high-density and yet-to-be-occupied residential apartment complexes nearing completion as we speak which will contain hundreds of new units in addition to the many residential subdivisions nearby and the large shopping center anchored by Walmart that already depend on Shiloh for access to the freeway daily and in the event of evacuation in this very high fire hazard area.

I read the environmental impact report and the other studies, and it seemed obvious to me that they were most likely hand-selected by slick consulting firms for their financial motivation to prepare reports with the desired outcome- because their findings are absurd.

You and the BIA are the last defense to stop the systematic and strategic manipulation of the facts in this case in what is an obvious attempt to skirt the rules

There are an almost unlimited number of far more suitable locations than this that I'm sure the Koi people can find that will not have a major adverse effect like it will on the residential nature of the community surrounding this proposed project.

I hope you can see through this "gaming" of your system purely for financial gain but with a total disregard for the negative consequences, and worse a manipulation of the facts and hiding of the truth that this is a horrible choice of a location and do the right thing by declining to approve the Koi Nation Shiloh Resort and Casino. They could throw darts at a map with a blindfold on and 90 out of 100 times, they would find a significantly better-suited location than this one.

This tribe has roots in Lake County, not Sonoma County, and there is ample land in Lake County that is significantly more affordable and much better suited for all of their needs including much more than a casino operated primarily by outside interests who would obtain most of the benefits while doing nothing the educational and economic growth and advancement of the current or future generations or preservation of the culture and way of life for this tribe.

Thank you for your service,

Mike Stone, Realtor®

CA DRE License #01139380

(707) 836-3445 Cell

www.sonomacountyhomepro.com

See my reviews by [clicking here](#)

From: Miles Bradley <bmilesbradley@yahoo.de>
Sent: Friday, December 6, 2024 10:24 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Hello Chad,

I am writing in opposition to the Shiloh Resort and Casino Project.

I am a regular user of the nearby Shiloh Regional Park where I hike after work. I value this space for its natural beauty and a nearby location to recreate and decompress. The planned Shiloh Resort and Casino would be detrimental to the current easy access to the park and would ruin the view from many parts of the park.

Additionally, the Shiloh Resort and Casino would add more traffic in an area that is residential.

In general, I find we already have enough casinos in the area with the Graton Resort and Casino just 15 miles away and the River Rock Casino just 17 miles away. These casinos are enough for this area. While I support more empowerment for native communities, these casino projects are the wrong way to go. They promote anti-social behavior such as smoking and alcohol consumption. They encourage gambling addiction and represent a financial drain on some of the people who visit them.

I would rather see protection of the nature component of this area with some other sort of development such as more park land. If there is to be development, our area has a desperate need for more housing which could hopefully be developed in a sustainable way that is congruent with the community.

I hope that you will take these points into consideration and stop the planned Shiloh Resort and Casino.

Thank you,

Miles Bradley
Sebastopol, Sonoma County, CA

From: Diane Stern <ldstern99@gmail.com>
Sent: Friday, December 6, 2024 12:21 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIA Comments, Shiloh Resort and Casino Project

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I live in the Oak Park Subdivision across from the proposed Shiloh Resort project. I bought here because it was semi rural but close to everything. Windsor is a family oriented town & does not need a casino. There are already two casinos in Sonoma County. River Rock in Geyserville & Graton in Rohnert Park. My concerns against the project are as follows:

- 1) Evacuations during wildfires: We've been evacuated 3 times in the last 7 years & it was gridlock trying to get to the 101 freeway. With the casino in place with thousands of extra vehicles trying to evacuate it would be a nightmare. People would be trapped & there would most likley be injuries & possible loss of life.
- 2) Traffic: Shiloh Rd. is a 2 lane road & already has too much traffic during commute hours.
- 3) Noise: This is a quiet neighborhood which would be ruined with the noise from the casino.
- 4) Crime: Increased crime is a problem with all casinos. Theft, burglary, intoxication, prostitution & violent crimes which could spill over into our neighborhood.
- 5) Decrease in property values.
- 6) Water & sewer problems & useage.
- 7) Increased strain on first responders (fire & police) who are already spread thin.
- 8) The proposed site is across the street from a park where kids have little leauge games & families have picnics.
- 9) The tribe is not from Sonoma County & is backed by a large tribe from Oklahoma who could care less about the residents here.

Lawrence S. Stern
5839 Leona Ct.
Windsor, CA 95492
530-598-1386
ldstern99@gmail.com

From: Ginna Gillen <ginnagillen@sbcglobal.net>
Sent: Monday, December 9, 2024 10:18 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Ginna Gillen <ginnagillen@sbcglobal.net>
Subject: [EXTERNAL] "FEIS Comments, Shiloh Resort and Casino Project"

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Once again, my husband and I want to go on record as being extremely opposed to the proposed Koi Nation Shiloh Casino and Resort Project in Santa Rosa. As long-time Windsor residents, we want the parties considering this proposal to understand that the negative impact of this development is real.

Our families were forced to evacuate our homes 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. Given the number of people currently living in this area (not to mention additional numbers from the proposed casino), there is absolutely no way of mitigating this hazard. You could not build enough escape routes! 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. This is a legal precedent that should NOT be set.

Virginia and James Gillen
9559 Ashley Drive
Windsor, CA 95492

From: AR Cribbins <cribbina@gmail.com>
Sent: Monday, December 9, 2024 12:29 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Request to oppose the proposed Koi Nation casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

I'm writing you with my concerns regarding the proposed casino project from Koi Nation near Windsor. I'm a coastal Pomo enrolled in the Lytton band with family connections to Kashia and Graton Rancheria, so this issue is personal to my community. It's unsettling that the BIA process seems to be moving so quickly to greenlight a casino in essentially the same Windsor area where my tribe struggled for over a decade to be allowed to even build houses.

To my understanding, Koi Valley's casino plan has already met significant opposition from not only the local Native community but also officials at all levels of government, including Governor Newsom. I've watched our tribal representatives fight to oppose the plan, but yet to no avail. While our tribe has worked hard to assess and lessen the environmental impact of developing our homeland community, I'm not convinced the Koi Nation plan has done likewise for their casino. It's scary to think about how a new casino from a nonlocal tribe could negatively affect the land and housing community that Lytton has spent so much time and effort developing. Many of our people are living there now and did not sign up for extra traffic, pollution and noise that would come with a big casino in this area.

Likewise, I'm also concerned about the financial ramifications for the tribes that already have gaming in the area, especially for Graton and Cloverdale. Another casino would only saturate the market and hurt the already established tribes (especially the smaller band of Cloverdale). Koi Valley should be looking closer to their ancestral homelands in Lake County instead.

As I've mentioned prior, there is a lot of overlap between families and communities in the Santa Rosa adjacent tribes. We are culturally, linguistically and personally connected and encouraged to look out for each other, even when our leaders' voices have been ignored. While I sympathize with Koi Nation's desire for financial independence, I can not support this proposal as it and strongly request both further review of environmental impact and continued conferencing with the local tribes to find a satisfactory solution. I will be also sending a letter.

Sincerely,

Ashley-Renee Nye

503-819-5833
arcribbins.com

From: Brian Williams <totemz1956@gmail.com>
Sent: Monday, December 9, 2024 12:44 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort Casino Project

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My name is Brian Williams, I live at 5801 Mathilde Dr. directly across from proposed project. We have reviewed your environmental report and see it as bias and limited to reality. The greedy Koi casino proposal in our neighborhood does not have any regard for the people who live right here. Last I heard the tribe has maybe 50 folks living in our county, far from their ancestral home. This corporate money grab under the guise helping the small tribe will run over all of us here. We are hard working people who have whole lives investment in our home and community. The Greedy Koi casino proposal cares not of us locals. Anybody who actually comes and visits this site and looks at their plans will see the obvious problem and see it for the greedy corporate money grab it is. I believe that the Koi have no grounds here and the project should be 100% denied. The greed here is corporate evil.
Sent from my iPhone

From: MJ Noble <mjbnoble@pacbell.net>
Sent: Monday, December 9, 2024 7:49 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Chad,

I am a resident of the Oak Creek Subdivision just North of the proposed casino project. I am extremely concerned about the effect the proposed casino will have on our neighborhood.

Here is a list of concerns:

During wildfires the intersection at Shiloh and Old Redwood Hwy has been extremely backed up during an evacuation. Adding more traffic from the casino would surely cause a greater backup and could potentially result in deaths.

Adding a business of this type to our serene country atmosphere is unacceptable.

The clients this type of business attracts is not appropriate near our neighborhoods.

East Shiloh road is an extremely narrow, two lane road which is used by many youngsters riding their bicycles to school and many folks walk for exercise on East Shiloh.

During our recent droughts we were encouraged to cut back on water usage, replace lawns with drought resistant plants and conserve, conserve, conserve. A casino would be a huge user of water which is unfair to us conserving in adjacent communities.

As stated above we have a very country feel to our neighborhoods, my subdivision does not have street lights or sidewalks. Lights coming from the casino would drastically change our current environment.

The Koi tribe is not a Sonoma County tribe. Their lands were in Lake County which is over 50 miles northeast of the proposed casino. Sonoma County already has two casinos which benefit the local tribes which are in Sonoma County. Another casino would certainly take business away from the existing casinos, which are legitimate Sonoma county tribes.

Please do not approve this casino project,
Mary Jane Noble
6256 Lockwood Dr
Windsor, CA. 95492

Sent from my iPad

From: Dan Parsons <danwparsons@gmail.com>
Sent: Monday, December 9, 2024 9:34 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Re: FEIS Comments, Shiloh Resort and Casino Project

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Dear Chad,

I failed to include this other report supporting my argument that a casino in a residential community is a tragic idea due to the increased likelihood of DUI related deaths.

Regards

[Microsoft Word - DUIEvaluation.docx](#)

[Assessment of the Casinos' Impacts on Operating Under the Influence \(OUI\) and OUI- Involved Traffic Collisions - Massachusetts Gaming Commission](#)

4 The relationship between impaired driving and the presence of licensed establishments has been studied by researchers for decades. Although a positive correlation between the two variables has been long-understood,¹ the specific contribution of a licensed establishment to drunk driving is tangled in a complex web of variables, including

massgaming.com

From: Dan Parsons <danwparsons@gmail.com>
Sent: Monday, December 9, 2024 9:13 PM
To: chad.broussard@bia.gov <chad.broussard@bia.gov>
Subject: FEIS Comments, Shiloh Resort and Casino Project

Dear Chad,

I am a Windsor, Sonoma County resident, and I strongly oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project.

The proposed casino location is in a residential area comprised of single family and multi-dwelling units. Across from the proposed site is Esposti Park, a well-maintained park where children play, people play with their pets and families gather regularly to play baseball on one of the two baseball diamonds. Less than one mile from the proposed

casino is Shiloh Park where people ride their bicycles along Shiloh Road. This South Windsor, Shiloh Road community is a growing family centric area with even more investment in families by means of new rent-to-income apartments currently in development.

It is well known that casinos are a liability to the family. This South Windsor community along Shiloh Road is growing, and so is traffic. Casino traffic is not that same as family traffic. Casinos encourage the use of alcohol as it is essential to its business. It is, therefore, inevitable that alcohol related fatalities will occur. The casino is a valid danger to this thriving family-based community. Please refer to the study - [The impact of casinos on fatal alcohol-related traffic accidents in the United States - ScienceDirect](#) for evidence supporting this.

The Koi Nation casino will be morally and legally liable for any alcohol related deaths caused by one of its patrons. The probability is high in this flourishing family community and the case for a civil lawsuit would be likely.

I've been a resident in this community for over 24 years and never has one of our children been harmed in a traffic accident within our area. Such a tragedy resulting from casino business will be devastating to the community and the casino's viability. I don't begrudge the Koi Nation's right to a casino, but not in a strong and growing family community. Avoid the risk of a costly tragic disaster and have the casino in an area more conducive to the business.

Sincerely,

Dan Parsons
Windsor, CA

December 10, 2024

PACIFIC REGIONAL OFFICE

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

2024 DEC 12 PM 12:06

BUREAU OF INDIAN AFFAIRS

Subject: FEIS Comments, Shiloh Resort and Casino Project

Dear Regional Director Dutschke:

I am a Windsor, Sonoma County resident, and I strongly oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project.

The proposed casino location is in a residential area comprised of single family and multi-dwelling units. Across from the proposed site is Esposti Park, a well-maintained park where children play, people play with their pets and families gather regularly to play baseball on one of the two baseball diamonds. Less than one mile from the proposed casino is Shiloh Park where people ride their bicycles along Shiloh Road. This South Windsor, Shiloh Road community is a growing family centric area with even more investment in families by means of new rent-to-income apartments currently in development.

It is well known that casinos are a liability to the family. This South Windsor community along Shiloh Road is growing, and so is traffic. Casino traffic is not that same as family traffic. Casinos encourage the use of alcohol as it is essential to its business. It is, therefore, inevitable that alcohol related fatalities will occur. The casino is a valid danger to this thriving family-based community. Please refer to the studies

<https://www.sciencedirect.com/science/article/abs/pii/S0167629610001013> and

<https://massgaming.com/wp-content/uploads/Public-Safety-OUI-Report-1.27.22.pdf> for evidence supporting this.

The Koi Nation casino will be morally and legally liable for any alcohol related deaths caused by one of its patrons. The probability is high in this flourishing family community and the case for a civil lawsuit would be likely.

I've been a resident in this community for over 24 years and never has one of our children been harmed in a traffic accident within our area. Such a tragedy resulting from casino business will be devastating to the community and the casino's viability. I don't begrudge the Koi Nation's right to a casino, but not in a strong and growing family community. Avoid the risk of a costly tragic disaster and have the casino in an area more conducive to the business.

Sincerely,



Dan Parsons

6120 Tyler Court
Windsor, CA

Assessment of the Casinos' Impacts on Operating Under the Influence (OUI) and OUI- Involved Traffic Collisions

Christopher W. Bruce

Crime Analysis Consultant to the Massachusetts Gaming Commission

19 January 2022

v. 1.2

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Executive summary

This report assembles available evidence for the impact of Plainridge Park, MGM Springfield, and Encore Boston Harbor on impaired driving in the region, to include complaints (arrests and summonses) for operating under the influence (OUI), OUI-involved crashes, and reports of “last drink” locations from guilty drunk drivers. Key findings are:

- As destination locations that serve alcohol, the casinos produce a number of impaired driving trips every year.
- The specific number of trips depends on the number of patrons, the average number of drinks consumed, the percentage of patrons leaving by car, the average distance traveled, the availability of transportation alternatives, and efforts by the casino and the police to control intoxication, to discourage impaired driving and to stop impaired drivers before they leave the casino.
- Many of the statistics associated with these variables are unknown, but both guesswork and evidence from past research suggest that among the three casinos, the number of impaired driving trips is in the tens of thousands per year. This is supported with available “last drink” reports from drunk drivers.
- These drunk driving “trips” likely translate into at least a few dozen additional crashes. Analysis of crashes with associated OUI charges shows increases on state roads within the three host communities as well as increases on some local roads in Plainville and Everett.
- Further research should be conducted after MGM and Encore have been open for longer periods, after COVID-19 is no longer creating havoc with drinking and driving patterns, and statewide datasets are available for alcohol-involved crashes.

None of the findings in this report are meant to cast “blame” at any of the casinos. From locations serving alcohol to millions of patrons per year, a certain amount of impaired driving is a mathematical inevitability, no matter how sincere the efforts the locations put into discouraging it. However, these findings do support the utility of targeted traffic enforcement at key times along local roads and highways leading to and from the casino as well as expanded public awareness efforts . They also demonstrate the utility of continued data collection of “last drink” reports during adjudication.

Background

This analysis is part of an ongoing effort by the Massachusetts Gaming Commission (MGC) to assess the social and economic influences of new gaming facilities across the state. The purpose of this report is to compile any and all evidence, within available datasets, of a casino influence on operating under the influence (OUI) and OUI-related crashes. Previous reports on individual casinos have considered limited evidence but have not been comprehensive.

The purpose of this report is *not* to assign or even suggest that blame should fall on individual casinos, casino operators, or their employees. Indeed, this report recognizes that a certain amount of impaired driving is inevitable in a society that allows liquor to be purchased and consumed away from home. The report simply seeks to quantify the contributions of the casinos to this specific type of social harm.

Background and summary of previous research

Each of Massachusetts's three casinos offers restaurants and bars that serve alcohol, plus drinks served to patrons engaged in gambling on the casino floor. Drinking and gambling have long been paired in popular images of casinos, including in promotions from the casinos themselves. Although service at restaurants and bars stops at 02:00, both Encore Boston Harbor and MGM Springfield can serve drinks to patrons engaged in gaming until 04:00.



Figure 1: A photograph of a cocktail entices visitors on the MGM Springfield website. "Enjoy a handcrafted cocktail while taking your luck to the highest limit," the caption offers. Alcohol and gambling are often linked in casino advertisements and public imagination.

The relationship between impaired driving and the presence of licensed establishments has been studied by researchers for decades. Although a positive correlation between the two variables has been long-understood,¹ the specific contribution of a licensed establishment to drunk driving is tangled in a complex web of variables, including density and distance.² A single bar in the middle of five dry counties may produce more drunk drivers than a very large cluster of hotel bars, for instance. This problem has been particularly acute in Connecticut, where the long distance between each of its casinos and major population centers has resulted in high risk of crashes for drunk drivers.³ Although their contributions to drunk driving have not been studied by social scientists, both casinos have come under fire in the media for numerous known fatalities caused by impaired drivers leaving the casinos.

Even when located closer to populated areas, casinos offer additional risks of drunk driving, as studies have shown that problem gambling and problem drinking often go hand-in-hand.⁴ Research has shown a strong link between the expansion of casino gambling in the United States and increases in alcohol-related traffic fatalities.⁵

Available literature does not produce a specific formula to determine the contribution of casinos or other licensed establishments on drunk driving in surrounding communities, but it does support an understanding of the variables that such a formula would include.

Factors Increasing Drunk Driving Risk	Factors Decreasing Drunk Driving Risk
<ul style="list-style-type: none"> • Number of patrons • Average drinks consumed per patron • Percentage of patrons arriving and leaving by car • Average distance traveled after leaving 	<ul style="list-style-type: none"> • Availability of transportation alternatives • Establishment efforts to control intoxication • Establishment efforts to identify and discourage intoxicated drivers from leaving in their cars • Perception of risk of getting stopped and arrested for OUI • Establishment and societal efforts to alert conscience of potential offenders and strengthen social controls

Understanding the specific risk posed by Massachusetts casinos means analyzing how these risk factors work in this state and among the specific facilities.

¹ Early evidence linking the variables is found in O’Donnell, M. A. (1985). Research on drinking locations of alcohol-impaired drivers: Implications for prevention policies. *Journal of Public Health Policy*, 6(4), 510–525. For a study that correlates drunk driving crashes with the proximity and volume of licensed establishments, see Cotti, C., Dunn, R.A., & Tefft, N. (2014). Alcohol-impaired motor vehicle crash risk and the location of alcohol purchase. *Social Science & Medicine*, 108, 201–209.

² The research into specific spatial variables on impaired driving patterns is still in its infancy. For a discussion, see: Wang, S., Chen, Y., Jianling, H., Liu, Z., & Ma, J. (2020). Spatial relationships between alcohol outlet densities and drunk driving crashes: An empirical study of Tianjin in China. *Journal of Safety Research*, 74, 17–25.

³ I am not aware of academic studies on Connecticut’s casinos specifically but the issue is often discussed by the news media. See, for example, Scworm, P. (2011, December 12). Mohegan Sun casino a mixed blessing for town. *The Boston Globe*. <https://www.bostonglobe.com/metro/2011/12/12/mohegan-sun-casino-mixed-blessing-for-montville-conn-area/a9JI8WyaFqkp2kIs65QDPK/story.html>. The Cotti and Walker article cited below cites a no-longer-available 2009 article from WFSB Hartford in which Mohegan Sun admitted that drunk drivers leaving its facility were a problem.

⁴ McGowan, R. (2013). Casino gambling and drunk driving: How are communities impacted? *Gaming Law Review & Economics*, 17(10), 747–759.

⁵ Cotti, C., & Walker, D. M. (2010). The impact of casinos on fatal alcohol-related traffic accidents in the United States. *Journal of Health Economics*, 29(6), 788–796.

Number of Patrons

The number of patrons visiting the casinos is perhaps the most important variable. Sheer numbers can overwhelm the other statistics: Strategies to reduce the number of intoxicated drivers leaving the facilities could be nearly 100% effective and still miss a handful of them every night.

Unfortunately, requests to the casinos for daily attendance figures did not produce usable results from all three locations. However, the figures that we did receive, plus those reported to the media, plus those estimated in previous reports issued by SEIGMA, suggest an average daily attendance of about 36,000 across all three casinos during the period of 2019 when all three were operating. This number is subject to significant variation by day, season, and time.

Average drinks consumed per patron / Establishment efforts to control intoxication

As previously mentioned, gambling and drinking are often paired in public imagination and in casino advertisements. To many patrons, the promise of “free drinks” on the casino floor helps them mentally offset the losses they inevitably suffer. To our knowledge, however, no statistics have been compiled that indicate what percentage of casino patrons

In an effort to reduce both impaired driving and other negative consequences of over-imbibing, Massachusetts General Law Chapter 138, Section 69 prohibits establishments from serving alcoholic drinks to intoxicated customers. There is also a long history of case law that holds licensed establishments (as well as private hosts) liable, under certain circumstances, for the behavior of patrons who become intoxicated at those locations.

The Massachusetts Alcoholic Beverage Control Commission (ABCC) encourages but does not require servers at licensed to receive a national training called TIPS to recognize signs of intoxication and thus know when to “cut off” that patron. The Massachusetts Gaming Commission does require this training for “managers and other principal representatives” (205 CMR 136.077.9.c), and the Commission’s Responsible Gaming guidelines direct casinos to implement several other policies, including limited distribution of alcohol during certain hours and disallowing intoxicated persons from gambling.

Although both Plainridge Park and MGM Springfield have been fined by the Gaming Commission for violations of alcohol regulations, none so far have been related to overserving. Indeed, all available evidence (including reports from the casinos and observations of Gaming Commission employees) suggests that the three facilities have complied with relevant laws, regulations, and guidelines by providing training to servers, cutting off intoxicated guests, and assisting intoxicated guests in getting a safe ride home. In addition, Gaming Commission agents routinely visit the facilities to verify compliance. However, it must be noted that casinos are large, loud, crowded places in which it is difficult to keep track of how many drinks a patron has been served and whether a patron has drunk too much to drive, a threshold that for some drinkers falls comfortably below that at which the patron is visibly intoxicated. Any system that relies heavily on a subjective assessment of intoxication inevitably misses some intoxicated drivers.

Percentage of patrons arriving and leaving by car / Availability of transportation alternatives

This percentage of patrons traveling by car simply has not been studied. We can only make guesses. The percentage is almost certainly over 75%, as it is for the percentage of Americans who drive to work. It is likely highest at Plainridge Park, which is in an area with limited public transportation, and lowest at Encore Boston Harbor. For MGM and Encore, these figures will be reduced mildly by the percentage of patrons spending the night in the casinos’ own hotels (MGM’s 240 hotel rooms and Encore’s 671 hotel rooms are a small percentage of the roughly 15,000 daily pre-COVID visitors).

As it is adjacent to Boston, Encore benefits from a robust public transportation network, including the MBTA subway, bus, and commuter rail system; courtesy shuttles to local hotels and Logan Airport; water transportation to Boston; proximity to national and international air, train, and bus options; and widespread availability of taxi and rideshare options. MGM Springfield likely receives the most foot traffic of the three casinos and also has nearby rail service and bus service provided by the Pioneer Valley Transportation Authority. Alternatives to Plainridge Park are mostly limited to taxi and rideshare options and private bus services out of Boston; it is safe to say that the vast majority of patrons to PPC arrive by car.

Average distance traveled after leaving

No hard data exists on this variable, either, but we can make some estimates. In a 2016 survey, only 11% of Plainridge Park patrons came from the host and surrounding communities, while 67% came from other parts of Massachusetts and 19% came from out of state.⁶ At MGM Springfield, 41% came from the host and surrounding communities, 18% from other parts of Massachusetts, and 40% from out of state.⁷ No statistics are yet available for Encore Boston Harbor, but if they remain within the parameters of the other two, between 58% and 89% of visitors are traveling more than a few miles once they leave the casino.

This variable means that the extent of impaired driving and impaired driving crashes may not be captured by local datasets. Data would have to be collected from throughout Massachusetts and other New England states, particularly Connecticut and Rhode Island, to comprehensively assess the impact of impaired drivers.

Establishment efforts to identify and discourage intoxicated drivers from leaving in their cars

For this variable, casinos have a significant advantage over other licensed establishments. They have a comprehensive surveillance and security network, plus the constant presence of state and local police officers. State law, Massachusetts Gaming Commission regulations, and general public opinion all encourage them to do their best to reduce the number of drivers leaving their parking areas while intoxicated.

Sheer numbers, however, make it difficult to intercede with all of them. Moreover, casinos lose control of this variable when patrons park at locations other than the casino lot or garage. Such a scenario is highly unlikely at Plainridge Park (which has no other convenient area parking) but modestly more likely at Encore and in particular at MGM. In all cases, the casino offers the least expensive, most convenient parking, but is also sometimes full, or inconvenient to other things that the patron wants to do in the area. We otherwise have no statistics on the percentage of patrons who choose to park elsewhere.

Perception of risk of getting caught and arrested for impaired driving

As a popular Problem-Oriented Policing guide notes:

Perhaps the single most significant factor in explaining why people drive while impaired is that they believe that there is little risk that they will be caught by police—and statistically, they are correct. By some estimates, the average drunk driver will drive while impaired between 80 and 2,000 times for every time he is apprehended, depending on the enforcement capacity of the local police. In fact, most drivers believe they are more likely to be involved in a crash than they are to be stopped by police.

⁶ University of Massachusetts School of Public and Health Sciences. (2019). *Social and economic impacts of Plainridge Park Casino: 2018*. Author, p. 35.

⁷ University of Massachusetts School of Public and Health Sciences. (2019). *2019 MGM Springfield patron survey: A look at who is visiting: 2018*. Author, p. 1.

Even the most committed police agencies and officers can stop or arrest only a very small percentage of the impaired drivers who are on the road at any one time—probably less than one percent.⁸

This factor affects impaired driving nationally and not just driving from specific locations. The perception of risk can be enhanced at those locations, however, with strategies like posted warnings and police visibility. We have no information about specific casino strategies in this area.

Societal efforts to alert conscience

Perhaps the most effective advertising slogan in history is “Friends don’t let friends drive drunk,” the tagline of a 1990 Ad Council campaign credited with the largest single-year drop in drunk driving fatalities. The slogan works by alerting the conscience not only of potential drunk drivers but the people around them—friends, colleagues, family members, even servers. Research has shown that such campaigns are effective at the local level as well as the national level.⁹ We are aware of no specific strategies along these lines at Massachusetts’s three casinos.

Tying it all together

Because of a lack of hard data for key variables, we cannot derive a specific prediction of the number of impaired drivers produced by the casinos. But to use a hypothetical example, assume that the following is true:

- 12,000 visitors arrive at a casino on a particular day
- 75% (9,000) arrive by car
- 60% of them drink
- 10% of those who drink become intoxicated
- 90% of those who become intoxicated are identified and deterred from driving by casino security or are motivated to find alternate transportation means by raised conscience or fear of getting caught.

Such an arrangement of variables would leave $20,000 * 0.75 * 0.6 * 0.1 * 0.1$, or 54 impaired patrons leaving the casino by car each day, for a total of 19,710 drunk driving trips per year (59,130 across three casinos), assuming that all factors are independent of each other. The National Institute of Health estimates that the probability that an impaired driving trip will result in a crash is 1 in 625, or 0.16%.¹⁰ We would thus expect this single casino to produce 32 impaired driving crashes per year, 96 for three casinos. Obviously, the number becomes higher or lower as the variables change. If only 80% of impaired drivers are deterred in the last step, the number doubles. If only 5% of those drinking become intoxicated, the number halves. There is essentially no circumstance, however, in which it reaches 0.¹¹

The rest of this report seeks to assess whether the number of impaired drivers coming from Massachusetts’s casinos is detectable among the datasets we have available.

⁸ Scott, M. S., Emerson, N. J., Antonacci, L. B., & Plant, J. B. (2006). *Drunk driving* [Problem Oriented Guides for Police, Problem-Specific Guides Series #36]. U.S. Department of Justice, Office of Community-Oriented Policing Services, pp. 6–7.

⁹ See, for instance, Niederdeppe, J., Avery, R., & Miller, E.N. (2017). Alcohol-controlled public service announcements (PSAs) and drunk-driving fatal accidents in the United States, 1996–2010. *Preventive Medicine*, 99, 320–325.

¹⁰ Miller, T., & Spicer, R. (1998). How drunk are U.S. drivers? Measuring the extent, risks, and costs of drunk driving. *Annual Proceedings of the Association for the Advancement of Automotive Medicine*, 42, 353–367.

¹¹ There are two additional variables unaddressed above because the lack of data makes it difficult to even estimate. The first is the number of impaired driving trips to the casino—that is, drivers who decided to visit the casino while already intoxicated. Even if turned away at the door, there is a way in which the presence of the casino “caused” the trip. The second is the percentage of drunk drivers leaving the casino who would have gotten drunk elsewhere if the casino had not existed. Even if this number is significant, the limited types of entertainment available at a casino almost certainly ensures that this population of drunk drivers is traveling farther, even if their number of trips remains constant. While this form of displacement remains a valid objection to the specific formula presented here, it does not diminish the overall point is that the number of drunk drivers “caused” by a casino is quantifiable and thus theoretically detectable.

Methodology and limitations

This report involves several different datasets. The methodology for the collection and use of each dataset and the limitations of those datasets are thus described in the relevant sections of the report.

About the author

Christopher W. Bruce is a professor of criminal justice at Husson University in Bangor, Maine. He is also a career crime analyst with previous service at the Cambridge Police Department (1994–2001) and the Danvers Police Department (2001–2010). He was president of the Massachusetts Association of Crime Analysts from 2000 to 2004 and president of the International Association of Crime Analysts from 2007 to 2012. He has served as an instructor in criminal justice and crime analysis topics at Suffolk University (2001–2010), Westfield State University (2009–2010), the University of Massachusetts Lowell (2009–2010), Middlesex Community College (2007–2011), Western Oregon University (2012–2016), and Tiffin University (2006–2018).

Mr. Bruce is an internationally-recognized expert in police data systems and police data analysis. He has trained, consulted, and provided technical assistance for various programs of the U.S. Department of Justice, Bureau of Justice Assistance; the U.S. Department of Transportation, National Highway Traffic Safety Administration; the Texas Department of Transportation; the U.S. Department of Justice, International Criminal Investigative Training Assistance Program; and the International Association of Directors of Law Enforcement Standards and Training. He lives in Maine.

Analysis of agency complaints for OUI

The first dataset presented in this report simply looks at the number of complaints (arrests, summonses, and other methods of charging drunk drivers) reported by each participating agency for the crime of operating under the influence, which is almost always operating under the influence of liquor.

This dataset is the least reliable of those used in this report when it comes to understanding the prevalence of impaired driving. It is heavily influenced by agency priorities, directives from executives, and initiative of individual patrol officers and troopers. There is some evidence, for instance, that local agencies anticipated more intoxicated drivers after the casinos opened and responded by conducting more OUI enforcement on key routes. This, in turn, increased the number of OUI arrests irrespective of the number of actual intoxicated drivers.

Nonetheless, the dataset has some value in its corroboration of other data show in this report. If nothing else, it is valuable to know the effects of the casinos on agency operations, including OUI enforcement and arrests, regardless of whether these effects correlate with actual impaired driving.

Methodology

The data used for this section was extracted directly from the records management systems of the participating police agencies and has been used over the past six years to generate a series of reports analyzing post-casino changes in crimes, collisions, and other police-related activity. The data collection and coding standards set by the FBI's National Incident-Based Reporting System (NIBRS), as promoted locally by the Massachusetts Executive Office of Public Safety and Security (EOPSS), have been instrumental in combining and analyzing data from multiple agencies.

OUI complaints in the Plainridge Park region

Raw data, years beginning 1 July and ending 30 June (casino opened on 24 June 2015)

Agency	Pre-Casino					Post-Casino			
	2011	2012	2013	2014	2015	2016	2017	2018	2019
Plainville	18	20	18	12	20	21	17	15	19
Attleboro	130	128	107	86	105	98	93	56	58
Foxborough	69	74	46	56	70	64	56	66	40
Mansfield	54	44	59	55	45	54	48	39	53
North Attleborough	23	6	12	9	43	63	47	57	32
Wrentham	6	8	9	4	12	5	7	12	11
State Police	35	38	27	29	43	32	42	31	34
Total	335	318	278	251	338	337	310	276	247

Aggregated data, years beginning 1 July and ending 30 June (casino opened on 24 June 2015)

Agency	Pre-PPC Avg.	Pre-PPC Range ¹²	Post-PPC Avg.	Pct Change
Plainville	17.6	15-21	18	+2%
Attleboro	111.2	95-127	76.3	-31%
Foxborough	63.0	53-73	56.5	-10%
Mansfield	51.4	46-57	48.5	-6%
North Attleborough	18.6	5-32	49.8	+167%
Wrentham	7.8	5-11	8.8	+12%

¹² Calculated as one standard deviation above and below the average.

Agency	Pre-PPC Avg.	Pre-PPC Range ¹²	Post-PPC Avg.	Pct Change
State Police	34.4	29-40	34.8	+1%
Total	304.0	270-338	292.5	-4%

The statistics show that the PPC region showed virtually no change in its total OUI complaints, although there are some notable exceptions at the agency level. In particular, North Attleborough showed a near tripling of its average. However, the statistics show that the agency's enforcement of OUI ramped up in the year before PPC opened.

In the four years after PPC opened, there were 19 arrests or summonses for OUI at the casino itself, almost all (17) made by State Police gaming enforcement agents. Although these incidents may not have occurred without PPC, it is important to recognize that most of them supply evidence of the system working right. That is, the impaired drivers were identified by PPC employees or Gaming Enforcement agents, and the State Police were able to stop the drivers before they left the property.

OUI complaints in the MGM Springfield region

MGM opened on 24 August 2018 and had about 18 months of unrestricted operation before the March 2020 COVID-19 closures. The "post-casino" period in the first data table looks at 12 months of data, but only for 2019.

Raw data, years beginning 1 September and ending 30 August (casino opened on 24 August 2018)

Agency	Pre-Casino						Post-Casino
	2013	2014	2015	2016	2017	2018	2019
Springfield	58	67	63	43	49	50	40
Agawam	27	44	40	32	27	21	44
Chicopee	41	36	43	49	49	59	84
East Longmeadow	27	33	26	27	19	31	23
Hampden	14	11	15	6	7	13	10
Holyoke	35	34	21	44	34	54	50
Longmeadow	39	15	21	20	14	21	18
Ludlow	35	38	46	39	54	55	57
Northampton	105	118	140	176	157	84	85
West Springfield	24	28	30	34	21	17	30
Wilbraham	53	94	69	59	66	28	39
State Police	358	359	361	229	325	220	284
Total	816	877	875	758	822	653	764

Aggregated data, years beginning 1 September and ending 30 August (casino opened on 24 August 2018)

Agency	Pre-MGM Avg.	Pre-MGM Range	2019	Pct Change
Springfield	55.0	47-63	40	-27%
Agawam	31.8	24-40	44	+38%
Chicopee	46.2	39-54	84	+82%
East Longmeadow	27.2	23-32	23	-15%
Hampden	11.0	8-14	10	-9%
Holyoke	37.0	27-47	50	+35%
Longmeadow	21.7	13-30	18	-17%
Ludlow	44.5	37-52	57	+28%
Northampton	130.0	99-161	85	-35%
West Springfield	25.7	20-31	30	+17%
Wilbraham	61.5	42-81	39	-37%
State Police	308.7	248-369	284	-8%
Total	800.3	723-877	764	-5%

This second set of numbers looks at two years post-casino but uses only the months of September through February for both the baseline and post-casino measures. The analysis stops at February because the casinos closed in response to COVID in March 2020 and did not re-open until July. Traffic volumes and patterns have been so widely affected that results after March 2020 cannot be legitimately compared to a baseline.

Raw data, years beginning 1 September and ending 29 February (casino opened on 24 August 2018)

Agency	Pre-Casino						Post-Casino	
	2013	2014	2015	2016	2017	2018	2019	2020
Springfield	33	26	33	19	33	21	15	35
Agawam	16	17	18	13	12	9	19	31
Chicopee	20	20	25	19	24	18	39	49
East Longmeadow	15	19	16	16	11	20	13	6
Hampden	10	3	6	2	2	10	5	4
Holyoke	18	21	9	21	20	25	22	36
Longmeadow	24	8	13	10	7	8	10	6
Ludlow	24	16	22	11	27	22	26	22
Northampton	40	69	72	98	85	46	38	76
West Springfield	29	34	39	24	37	16	20	20
Wilbraham	15	10	13	23	7	4	10	27
State Police	158	173	129	104	148	85	138	235
Total	402	416	395	360	413	284	355	547

Aggregated data, years beginning 1 September and ending 29 February (casino opened on 24 August 2018)

Agency	Pre-MGM Avg.	Pre-MGM Range	Post-MGM Avg.	Pct Change
Springfield	27.5	22–33	25.0	-9%
Agawam	14.2	11–17	25.0	+76%
Chicopee	21.0	18–24	44.0	+110%
East Longmeadow	16.2	13–19	9.5	-41%
Hampden	5.5	2–9	4.5	-18%
Holyoke	19.0	14–24	29.0	+53%
Longmeadow	11.7	6–18	8.0	-31%
Ludlow	20.3	15–26	24.0	+18%
Northampton	68.3	48–89	57.0	-17%
West Springfield	29.8	22–38	20.0	-33%
Wilbraham	12.0	6–18	18.5	+54%
State Police	132.8	102–163	186.5	+40%
Total	378.3	332–424	451.0	+19%

While the initial year started off lower than average, most agencies—particularly the State Police—significantly increased their enforcement efforts during the September 2019–February 2020 period. The region was headed for a record annual high before COVID stepped in and changed driving habits.

The agencies that reported increases in drunk driving complaints are those that have more local travel routes to and from the casino. That is, unless a driver specifically lived in those communities, he would be unlikely to pass through Longmeadow, East Longmeadow, Hampden, or Northampton (all of which reported decreases) on local roads. The other communities have non-highway routes to other destinations in the region. With the exception of West Springfield, all of them reported increases in OUI complaints during the six-month period.

In contrast to the other two casinos, no complaints were made from incidents that occurred at the casino itself. Springfield only made a single post-casino arrest on the immediate MGM block.

OUI complaints in the Encore Boston Harbor region

For Encore, we only have a single eight-month period post-casino and pre-COVID.

Raw data, years beginning 1 July and ending 29 February (casino opened on 23 June 2019)

Agency	Pre-Casino						Post-Casino
	2014	2015	2016	2017	2018	2019	2020
Everett	14	14	12	17	24	23	50
Chelsea	21	24	34	27	48	23	31
Lynn	55	91	74	85	78	64	89
Melrose	8	3	8	3	3	5	4
Revere	35	28	48	71	48	41	36
Saugus	17	14	16	22	15	31	23
Somerville	15	26	27	30	19	26	18
State Police	161	131	97	187	124	149	199
Total	326	331	316	442	359	362	450

Aggregated data, years beginning 1 July and ending 29 February (casino opened on 23 June 2019)

Agency	Pre-EBH Avg.	Pre-EBH Range	2020	Pct Change
Everett	17.3	13–22	50	+188%
Chelsea	29.5	20–39	31	+5%
Lynn	74.5	62–87	89	+19%
Melrose	5.0	3–7	4	-20%
Revere	45.2	32–59	36	-20%
Saugus	19.2	13–25	23	+20%
Somerville	23.8	19–29	18	-24%
State Police	149.7	121–178	199	+33%
Total	364.2	283–446	450	+24%

The Encore region showed total OUI complaints were significantly above the pre-casino average. It was not universal for all agencies. Everett (the host community) and the State Police reported the largest changes. A subsequent section shows that both agencies saw an increase in OUI-involved crashes, but it also appears that both agencies ramped up OUI enforcement in anticipation of the casino.

Six Everett Police incidents and two State Police incidents occurred at the casino itself, again a possible sign that detection measures are working.

Conclusions

The results for this dataset—again, the least important of the data in this report—showed results highly variable by agency. Changes were most heavily noted in the Springfield area between September 2019 and February 2020 and the Everett region between July 2019 and February 2020. Only in the Everett region are these increases correlated with observed increases in OUI-involved crashes during the same period.

Analysis of “last drink” reports at adjudication

Massachusetts General Law Chapter 90, Section 24J requires courts to collect from individuals adjudicated guilty (whether by trial or plea) of OUI, “whether he was served alcohol prior to his violation of said section at an establishment licensed to serve alcohol on the premises and the name and location of said establishment.” Court clerks send such “last drink” reports to the Alcohol Beverage Control Commission (ABCC).¹³

These reports have long been used to prioritize certain bars for additional training and enforcement. They provide direct evidence of at least some influence of certain facilities on drunk driving.

Methodology and limitations

Upon request, the ABCC provided spreadsheets for “last drink” adjudications from January 2016 to May 2021. The data includes 8,438 adjudication records, but only about 7,400 offer an identifiable location, and of those, 847 list private residences, leaving around 6,500 identifiable licensed locations.

As last drink data is collected only from those who plead guilty or are found guilty at trial, the 8,438 records represent only about 15-17% of the 50,000–60,000 people charged with OUI in Massachusetts during the coverage period. These, in turn, represent only a small percentage of the actual number of impaired drivers on the road during this period. Because the numbers represent *all* drunk driving arrests, not just those that stemmed from crashes, they will be heavily influenced by the decisions of specific police agencies and their officers and thus are not necessarily a good representation of where people are drinking.

Results

All three casinos appear within the “Last Drink” data. Specifically:

- **Plainridge Park** was named as the place of last drink for 19 cases adjudicated between November 2016 and February 2020, with offense dates between October 2016 and August 2019. For the period in which the casino was open, it was fourth-highest in the state for “last drink” reports.
- **MGM Springfield** was named as the place of last drink for 18 cases adjudicated between September 2019 and December 2020, with offense dates between August 2018 and September 2020. For the period in which the casino was open, it was second-highest in the state for “last drink” reports.
- **Encore Boston Harbor** was named as the place of last drink for 11 cases adjudicated between July 2019 and December 2020, with offense dates between June 2019 and November 2020. For the period in which the casino was open, it was tied with MGM for second-highest in the state for “last drink” reports.

For the period between September 2019 and February 2020, when all three casinos were open, the number of drunk drivers arrested who later reported one of the three casinos as their place of last drink was 13. If this number did represent a random distribution of drunk drivers, it would suggest that 76–87 total drivers were arrested in Massachusetts during that period after coming from one of the three casinos, a rate of 152–174 per year. If it is

¹³ The law requires reports of “last drink” locations only in cases of guilty findings or pleas. The perception of the ABCC (via personal correspondence) is that most courts have applied this literal interpretation. There are some anecdotal reports of courts also asking about last drinks when a case is continued without a finding (CWOFF). If some courts are doing so, the practice would result in an overrepresentation of facilities in those regions. The percentage of last drink reports from solely guilty verdicts versus those obtained from CWOFFs could not be assessed at publication time.

further true that there is only a 1 in 500 chance of an individual being arrested for every impaired driving “trip,”¹⁴ this figure suggests between 76,000 and 87,000 impaired driving trips from Massachusetts casinos every year. This figure is not to be relied upon: It is extrapolated from only 6 months of data; data collected from adjudications do not represent a random sample; and estimates of likelihood of arrest from a single New York survey may not be representative of Massachusetts. However, the figure is remarkably similar to the estimated number of drunk driving trips derived by a combination of research and guesswork in an earlier section (76,650). If it is wrong, it is probably still within an order of magnitude. That is, the number of “last drink” reports from casinos almost certainly translates into tens of thousands of drunk driving “trips” per year.

Rank	2015–2020 (PPC Years)	2018–2020 (MGM years)	2019–2020 (EBH Years)
1	TD Garden, Boston (30)	TD Garden, Boston (22)	TD Garden, Boston (13)
2	Gillette Stadium, Foxborough (28)	MGM Springfield, Springfield (18)	MGM Springfield, Springfield (11)
3	Barrett’s Ale House, Bridgewater (23)	Encore Boston Harbor, Everett (11)	Encore Boston Harbor, Everett (11)
4	Plainridge Park Casino, Plainville (19)	The Ritz, Oak Bluffs (9) Scorpion Bar, Foxborough (9)	The Still, Agawam (8)
5	MGM Springfield, Springfield (18)	Buffalo Wild Wings, Shrewsbury (9)	Scorpion Bar, Foxborough (5) Buffalo Wild Wings, Shrewsbury (5)
6	Duck Inn Pub, Hyannis (18)		
7	The Ritz, Oak Bluffs (17)	Gillette Stadium, Foxborough (8)	Funky Murphy’s, Marlborough (5)
8	Bar Louie, Foxborough (17)	The Still, Agawam (8)	Yard House, Lynnfield (5)
9	Wamesit Lanes, Tewksbury (16) Fenway Park, Boston (16)	British Beer Company, Hyannis (8)	The Ritz, Oak Bluffs (4) Duck Inn Pub, Hyannis (4)
10	Taylor’s Tavern, Greenfield (16)	Duck Inn Pub, Hyannis (7) Bar Louie, Foxborough (7) Fenway Park, Boston (7) Taylor’s Tavern, Greenfield (7) Smitty’s Pub, Greenfield (7)	Bar Louie, Foxborough (4) Smitty’s Pub, Greenfield (4) Wamesit Lanes, Tewksbury (4) Whiskey on Water, Worcester (4)
16		Plainridge Park Casino, Plainville (6)	
25			Plainridge Park Casino, Plainville (2)

Figure 2: Top “last drink” locations in three time periods. Source: Massachusetts Alcoholic Beverage Control Commission.

We lack specific figures on patronage at any of the above locations, but it seems likely that the number of “last drink” reports for a location is highly correlated with the number of patrons. It is not surprising to see Gillette Stadium, TD Garden, and Fenway Park within the top locations given the sheer volumes of attendance that the locations receive.

¹⁴ This figure is attested by survey research carried out in New York state: Dowling, A., MacDonald, R., & Carpenter, K. H. (2011). Frequency of alcohol-impaired driving in New York State. *Traffic Injury Prevention*, 12(2), 120–127.

Analysis of crashes with OUI charges

Although the Massachusetts police crash reporting form has fields for suspected alcohol use and suspected drug use, there are a few problems using those fields for analysis. First, they were not introduced until 2013, making it difficult to establish a baseline statistical level prior to the opening of the first casino in 2015. Second, even after the fields were introduced, reporting was, in the words of a Department of Transportation official in a personal communication, "sporadic." This assessment is confirmed by my own analysis of the field, which shows that among agencies contributing data to this report, it is used less than 10% of the time in which a driver in the same crash is actually charged with Operating Under the Influence.

Thus, the better way to determine if a crash involves the use of alcohol is to determine if anyone was arrested or summonsed for Operating Under the Influence on scene. This method will miss a small number of OUI-involved crashes, principally ones in which the driver was killed, but these are relatively rare.

Methodology

The data for this section was extracted directly from the records management systems (RMS) and computer-aided dispatch (CAD) systems of each participating agency via open-database connectivity (ODBC) technology. The data was collected at the incident level, with all related dates, times, locations, involved persons, vehicles, and offenses.

An SQL query linked a) police incidents initially reported as vehicle crashes with b) incidents in which a driver was charged with OUI, based either in the NIBRS code of 90D ("drunk driving") or a textual description of the offense that indicates impaired driving. The linkage was made through the common CAD number assigned to all incidents.

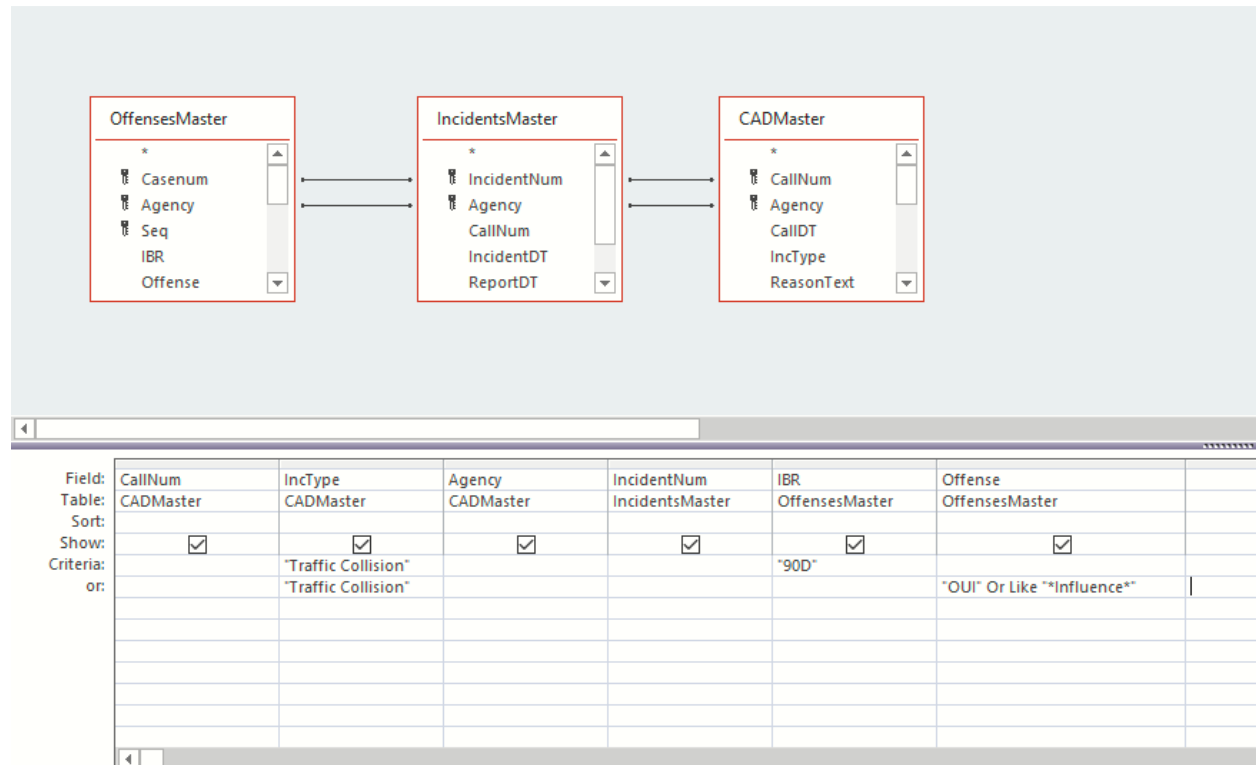


Figure 3: A query finds incidents that started as traffic collisions but were later reported by the agency as operating under the influence.

The accuracy is quite high because traffic accidents are an extremely common call for service and thus rarely miscoded, and the CAD number is a required field in the associated incident record for all RMS systems. However, the following errors could rarely occur. They are so rare that in a manual search of records, I could not find enough relevant reports to estimate their frequency, even with thousands of records in the sample.

- The officer could be dispatched to a crash but then request a new CAD record for the OUI arrest.
- The CAD event or criminal charge could be miscoded.
- Serious injury or death could preclude an OUI charge.

The following tables and analyses summarize these datasets for the three regions. Note that the time periods differ because the casinos opened at different times. I did not collect the literal charge from most of the agencies, only the charge category. With available data, I cannot separate charges of operating under the influence of drugs and operating under the influence of alcohol in the data collected. However, data from a sample of agencies shows that between the two, OUI alcohol is charged between 90 and 95 percent of the time, depending on time period and agency, making OUI drugs a relatively insignificant contributor to any OUI dataset. It is safe to assume that the vast majority of the numbers below represent alcohol-related OUI charges.

The onset of the COVID-19 pandemic provides a hard endpoint for this analysis. Between March and July 2020, not only were all three casinos shut down, but so were almost all bars and restaurants. The effects of COVID on public safety far exceed this short period of absolute closure, however. Various types of businesses have had various types of restrictions imposed and lifted, more workers and students are telecommuting, and in general many Americans have been wary of social gatherings and crowded places. The pandemic has affected the way that Commonwealth residents both drink and drive, an influence that goes far beyond our ability to isolate the effects of individual facilities.

Unfortunately, this means that for MGM, we have less than two years of post-Casino, pre-COVID data to compare. For Encore Boston Harbor, we have less than a year. The tables below use a variety of time periods based on data available.

Crashes with OUI charges in the Plainridge Park region

Plainridge Park opened on 24 June 2015, so the data has been aggregated in to years beginning 1 July and ending 30 June, including five pre-PPC years and four post-PPC years. All six designated surrounding agencies contributed data throughout the life of the study.

Raw data, years beginning 1 July and ending 30 June (casino opened on 24 June 2015)

Agency	Pre-Casino					Post-Casino			
	2011	2012	2013	2014	2015	2016	2017	2018	2019
Plainville	7	1	7	4	9	11	4.0	7	7
Attleboro	27	33	25	17	20	5	13.0	5	24
Foxborough	27	26	24	28	40	22	43.0	22	14
Mansfield	26	24	40	22	19	30	34.0	11	23
North Attleborough	0	0	0	0	0	1	0.0	0	8
Wrentham	2	3	3	2	4	2	6.0	1	5
State Police	12	13	6	18	11	27	20	12	14
Total	101	100	105	91	103	98	120	58	95

Aggregated data, years beginning 1 July and ending 30 June (casino opened on 24 June 2015)

Agency	Pre-PPC Avg.	Pre-PPC Range	Post-PPC Avg.	Pct Change
Plainville	5.6	3-8	7.3	+29%
Attleboro	24.4	19-30	11.8	-52%
Foxborough	29.0	23-35	25.3	-13%
Mansfield	26.2	19-33	24.5	-6%
North Attleborough	0.0	0-0	2.3	N.C.
Wrentham	2.8	2-4	3.5	+25%
State Police	12.0	8-16	18.25	+52%
Total	100.0	79-96	92.75	-7%

Plainville, the host community, had the largest percentage increase among the local agencies, although this translates to an average of only 2 incidents per year. Other communities reported decreases or stayed the same, although North Attleborough had an odd distribution, reporting only one OUI-related crash in the entire 2011-2018 period, and then suddenly reporting 8 during a four-month period between August and November 2018.

The most notable statistics come from the state police, where we saw a jump of roughly 6 incidents per year post-casino. The immediate post-casino year (2016) was the highest in this period.

Crashes with OUI charges in the MGM Springfield region

MGM Springfield opened on 24 August 2018. We have 19 months of post-casino, pre-COVID data. All 11 designated surrounding communities participated in the analysis.

The first set of statistics considers the full year post-casino only, meaning that it includes only 2019 (as the full year for 2020 was truncated by COVID).

Raw data, years beginning 1 September and ending 30 August (casino opened on 24 August 2018)

Agency	Pre-Casino						Post-Casino
	2013	2014	2015	2016	2017	2018	2019
Springfield	23	31	40	45	33	38	28
Agawam	10	17	19	12	10	17	13
Chicopee	30	59	55	45	45	44	49
East Longmeadow	15	13	12	12	23	15	13
Hampden	4	4	4	2	4	5	3
Holyoke	29	31	23	46	40	39	43
Longmeadow	13	11	11	9	13	18	7
Ludlow	25	19	18	17	30	22	17
Northampton	23	38	44	39	28	25	28
West Springfield	27	47	40	43	35	29	35
Wilbraham	21	13	13	17	25	12	11
State Police	35	40	39	44	59	47	72
Total	255	323	318	331	345	311	319

Aggregated data, years beginning 1 September and ending 30 August (casino opened on 24 August 2018)

Agency	Pre-MGM Avg.	Pre-MGM Range	2019	Pct Change
Springfield	35.0	28-42	28	-20%
Agawam	14.2	11-18	13	-8%
Chicopee	46.3	37-56	49	+6%
East Longmeadow	15.0	11-19	13	-13%
Hampden	3.8	3-5	3	-21%

Agency	Pre-MGM Avg.	Pre-MGM Range	2019	Pct Change
Holyoke	34.7	27-42	43	+24%
Longmeadow	12.5	10-15	7	-44%
Ludlow	21.8	17-26	17	-22%
Northampton	32.8	25-41	28	-15%
West Springfield	36.8	30-44	35	-5%
Wilbraham	16.8	12-22	11	-35%
State Police	44.0	36-52	72	+64%
Total	313.8	285-342	319	+2%

This second set of numbers looks at two years post-casino but uses only the months of September through February for both the baseline and post-casino measures.

Raw data, years beginning 1 September and ending 29 February (casino opened on 24 August 2018)

Agency	Pre-Casino						Post-Casino	
	2013	2014	2015	2016	2017	2018	2019	2020
Springfield	14	12	28	18	21	18	9	26
Agawam	3	12	12	5	4	8	3	6
Chicopee	17	29	33	18	21	19	27	23
East Longmeadow	8	7	8	5	10	8	6	3
Hampden	3	1	3	0	0	4	2	3
Holyoke	13	17	13	23	19	20	19	24
Longmeadow	7	4	4	6	5	7	3	1
Ludlow	15	12	8	9	14	10	9	8
Northampton	14	21	17	17	15	13	10	16
West Springfield	13	20	19	18	19	13	13	20
Wilbraham	12	9	8	7	9	9	6	9
State Police	15	22	21	23	44	28	40	43
Total	134	166	174	149	181	157	147	182

Aggregated data, years beginning 1 September and ending 29 February (casino opened on 24 August 2018)

Agency	Pre-MGM Avg.	Pre-MGM Range	Post-MGM Avg.	Pct Change
Springfield	18.5	13-24	17.5	-5%
Agawam	7.3	4-11	4.5	-38%
Chicopee	22.8	17-29	25	+10%
East Longmeadow	7.7	6-9	4.5	-42%
Hampden	1.8	0-3	2.5	+39%
Holyoke	17.5	14-21	21.5	+23%
Longmeadow	5.5	4-7	2	-64%
Ludlow	11.3	9-14	8.5	-25%
Northampton	16.2	14-19	13	-20%
West Springfield	17.0	14-20	16.5	-3%
Wilbraham	9.0	7-11	7.5	-17%
State Police	25.5	16-35	41.5	+63%
Total	160.2	144-176	164.5	+3%

Both datasets tell the same story: if impaired drivers are leaving MGM Springfield, they are not having a statistical impact on local roads. With the sole exception of Holyoke, all agencies reported totals within or below their past normal ranges. There is particularly no apparent correlation between the increase in OUI complaints reported by some communities (see the previous section) and additional OUI-involved crashes in those communities.

On roads policed by the State Police, however, the increase in OUI-involved crashes was significant (between 1.6 and 2.5 standar deviations above the mean for both periods). A map shows particular clustering around the 295/195/Turnpike triangle, all of which might be favored by drivers heading to different destinations from MGM. While there is no direct proof linking these crashes to the casino, the increase immediately following the opening of the casino is strong circumstantial evidence.

OUI Crash Reports Taken by State Police, September 2018 to February 2020

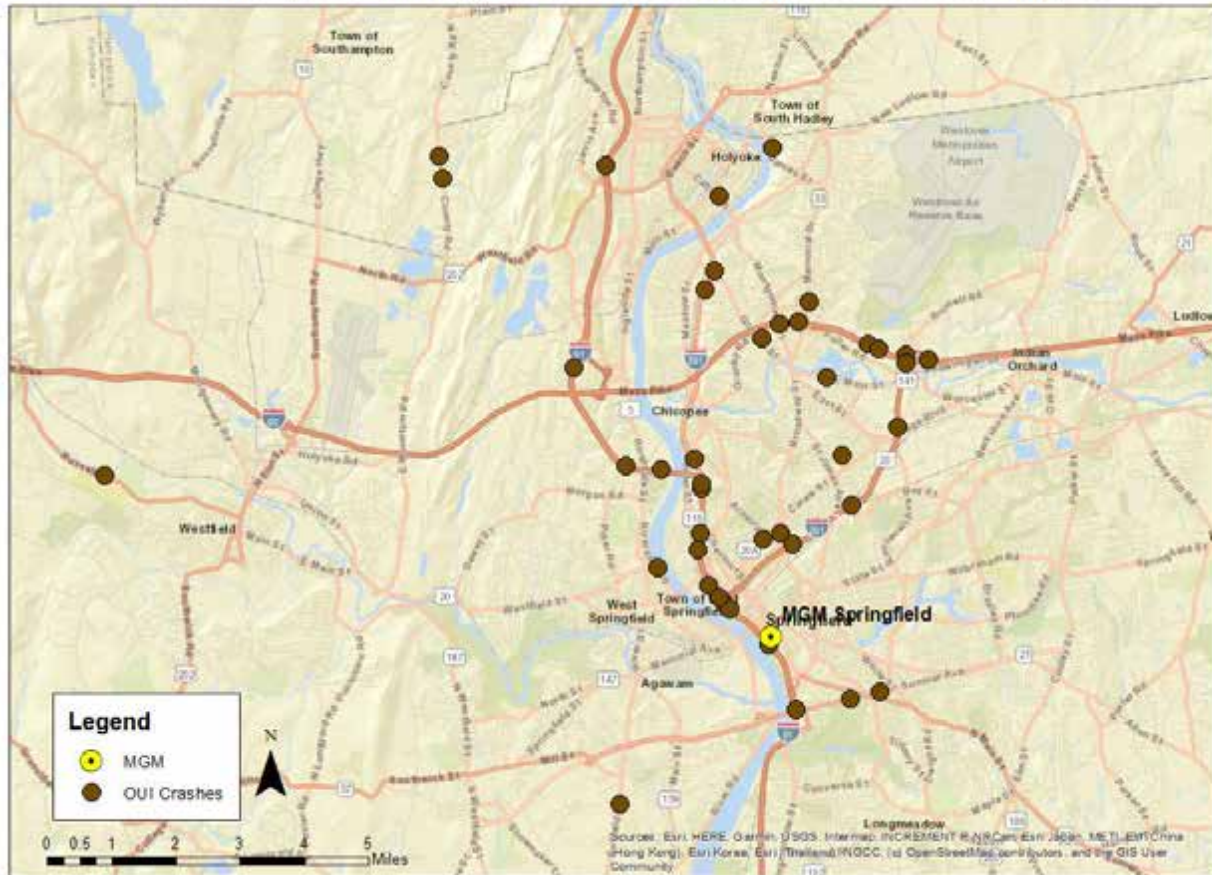


Figure 4: Crash reports with OUI charges taken by State Police in the MGM region.

Crashes with OUI charges in the Encore Boston Harbor region

Encore Boston Harbor opened on 23 June 2019. We have 8 months of post-casino, pre-COVID data. Unfortunately, there are some significant holes in the data. Cambridge and Medford declined to participate in the analysis. Malden initially participated but was unable to contribute data for the post-casino period.

Raw data, years beginning 1 July and ending 29 February (casino opened on 23 June 2019)

Agency	2013	2014	2015	2016	2017	2018	2019	2020
Everett	3	5	2	2	2	1	3	17
Chelsea	17	12	15	24	18	21	12	16
Lynn	32	24	54	36	46	46	37	40
Melrose	3	3	1	5	2	3	2	2
Revere	12	18	15	23	32	17	19	18
Saugus	4	10	5	3	6	6	12	8

Agency	2013	2014	2015	2016	2017	2018	2019	2020
Somerville	18	10	17	12	14	9	11	12
State Police	35	43	34	43	56	42	58	67
Total	124	125	143	148	176	145	154	180

Aggregated data, years beginning 1 July and ending 29 February (casino opened on 23 June 2019)

Agency	Pre-EBH Avg.	Pre-EBH Range	2020	Pct Change
Everett	2.6	1-4	17	+561%
Chelsea	17.0	13-21	16	-6%
Lynn	39.3	30-49	40	+2%
Melrose	2.7	2-4	2	-26%
Revere	19.4	13-25	18	-7%
Saugus	6.6	4-10	8	+22%
Somerville	13.0	10-16	12	-8%
State Police	47.3	39-56	67	+42%
Total	145.0	129-161	180	+24%

It appears that nothing has significantly changed in the area with the sole exceptions of Everett and the roads patrolled by the State Police. The casino host community reported a near-sixfold increase in crashes related to OUI in the first six eight months post-casino. Moreover, twelve of these additional incidents happened on Broadway Street. The Everett Police Department flagged five incidents as "Encore Related," indicating there was specific evidence that the driver had been coming from the casino.

The State Police, meanwhile, have seen concentrations on Route 16 between Revere and Medford and on the Fellsway. If Encore did cause an increase in OUI-related crashes in the area, the geography makes sense. Patrons leaving Encore have an immediate choice to turn north or south. Southbound traffic quickly crosses the bridge to Boston, from which we did not receive crash data and thus could not provide statistics to support this analysis. Traffic turning north from Encore can do any of the following:

1. Continue north through Everett (which had a significant increase along this route) and Malden (which did not supply us with post-casino data) before reaching Route 1.
2. Turn east on Route 16 and continue into Chelsea and Revere, which showed a small concentration of OUI-related crashes.
3. Turn west on Route 16 and continue into Medford or Somerville, which showed small concentrations of OUI-related crashes.

Unless going home to those communities, drivers are less likely to take local roads through Chelsea, Revere, Lynn, Melrose, Saugus, and Somerville, accounting for the lack of an increase seen in those areas.

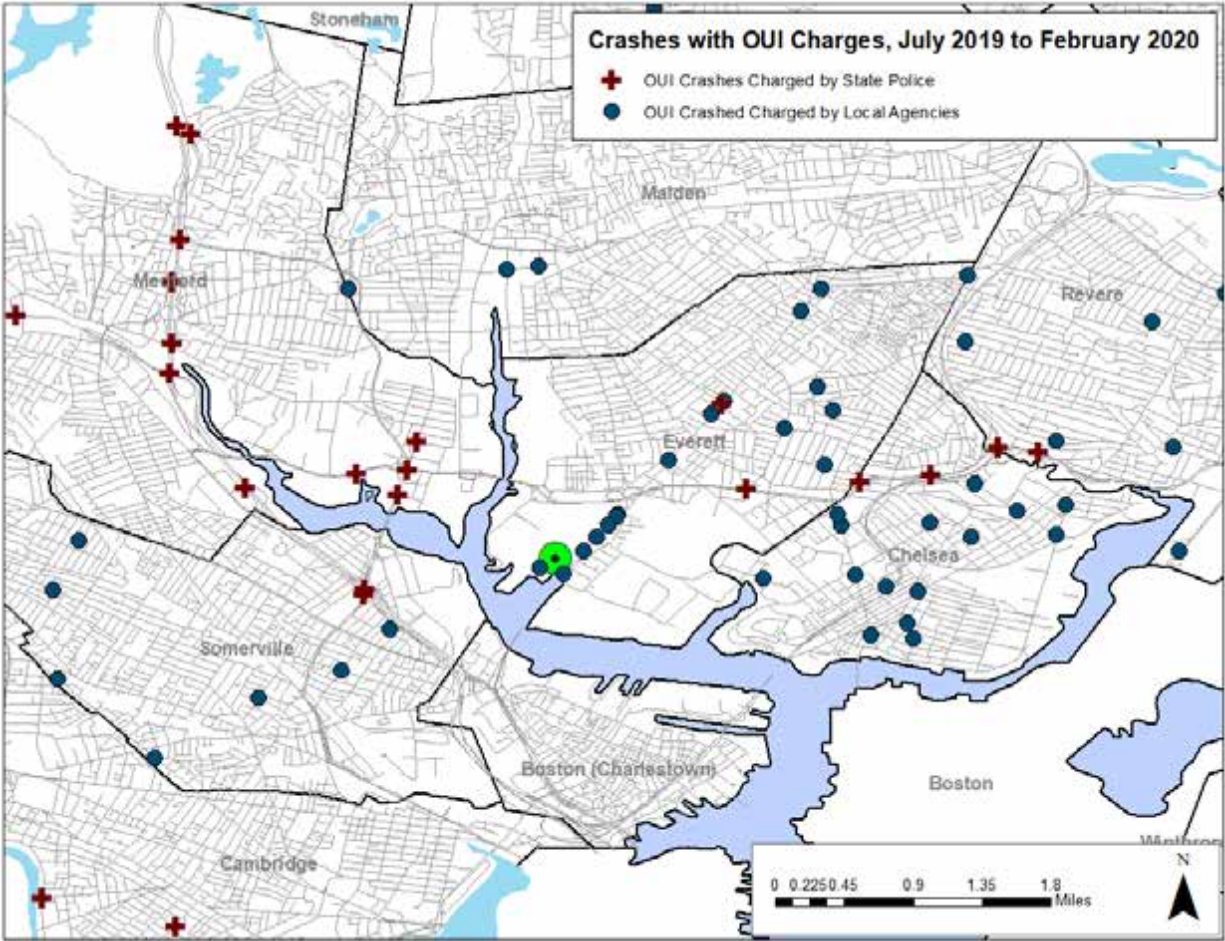


Figure 5: Crashes with resulting OUI charges in the Encore region.

Conclusions

The statistics show mixed results for the three casino areas. The most consistent set of statistics among them show increases in OUI-involved crashes on highways patrolled by the State Police. This is perhaps to be expected, as all three casinos are within half a mile of a major state route. In Plainville and Everett, the host communities also saw an increase in collisions on local roads. Only in Everett was this number significant, and the evidence for a casino relationship there is bolstered by both the geography and the agency's own investigations into the incidents.

Conclusions

This report is an initial analysis of available data covering the relationship between Massachusetts's three casinos and impaired driving. The three casinos were only jointly open for three months before COVID closures significantly changed both drinking and driving patterns in a way that likely overwhelms our ability to detect casino-specific influences. More data should be available in future periods when the COVID threat lessens and routines return to normal.

This initial data, however, combined with past research and experience, tells a relatively consistent story. Casinos serve alcohol to thousands of patrons per day, most of whom arrive by car. Even the best efforts by the casinos to stop patrons from becoming intoxicated, and the best efforts by both the casinos and the police to stop intoxicated patrons from driving, will fail to corral all of them. The sheer numbers of patrons that the casinos receive likely translates into tens of thousands of impaired driving "trips" per year, which in turn results in both an increased number of arrests and an increased number of collisions. These outcomes are mathematically inescapable, although they may be reduced by focusing on factors known to both encourage and suppress impaired driving.

Estimating exact numbers is very difficult due to the lack of available data in some areas and the lack of comprehensive research in others. But the totality of the datasets supports the conclusion that among some tens of thousands of impaired driving "trips" to and from the casinos—a reality that both past research and "last drink" data support—there have been several dozen additional OUI-involved crashes, mostly on roads patrolled by the State Police, within the three host communities. There are likely more crashes waiting to be found in other communities with statewide datasets, analysis of which should be a priority in future reports.

From: Teara Smith <teara_smith@yahoo.com>
Sent: Tuesday, December 10, 2024 9:31 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Teara Smith Statements: Opposition of Koi Nation

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Good Morning,

I hope this letter is taken into consideration when this decision is made. I am a mother, business owner in an affluent shopping center and I care deeply for our Sonoma County community. We live in a beautiful and diverse area and I would love for my children to experience the same thing when they are my age.

I hope you have a good day and happy holidays.

Thanks for your time,

Teara L.F Steele-Smith

teara_smith@yahoo.com
(707)272-5545
9703 Abalone Cir.
Windsor, CA 95492

Teara L.F. Steele-Smith

9703 Abalone Circle
Windsor, CA 95492
(707)272-5545
Teara_smith@yahoo.com

December 8, 2024

Chad Broussard
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, California 95825

My name is Teara Little Fawn Steele-Smith and I am a Tribal member of Lytton Rancheria Band of Pomo Indians. Both of my parents are descendants of Lytton Rancheria. My life's mission is to support and elevate our Native community culturally and this is my standing with what Koi Nation (Lower Lake Rancheria) threatens. There is complete disregard for the voices of Native people to the proposed site; Lytton Rancheria, Dry Creek Rancheria, Cloverdale Rancheria, Graton Rancheria and Wappo Tribe to name a few. Wappo Tribe is not federally recognized, but if they were, they would not have the opportunity for economic or cultural development due to the disregard Koi Nation and it's supporters have for local Tribal communities and the community as a whole. This would also take any chances away from Cloverdale Rancheria Tribe to create economic development to support their tribal members. The Tribes will forever feel and live with the negative outcome Koi Nations Actions bring.

This is insulting and infuriating to see a Tribe from a completely separate county, a tribe that is not from here, pushing a project on our ancestral lands. They are showing they are self interested and willing to harm any local tribes in the process. What will this look like seven generations later? The other local tribes have very good relationships and work together to create a positive environment and care for the welfare of our people from here. Tribes who are still fighting to be here and stay here where we are originally from. One bad apple will cause destructive disruption and harm to an existing harmonious Native Tribal community.

This project puts our recently established homeland and everything we have fought so hard for, at risk economically, physically and culturally. Our Tribe and family has suffered immensely while fighting to return to our homelands. We have encountered well beyond dozens of deaths of elders and relatives, including our Chairwoman Margie Mejia. She lost her life after battling the fight to return us home in Windsor, California. She didn't get the chance to live on Lytton Rancherias homeland, she didn't see her family finally return home together. Along side her work to return home, she and the Tribe donated countless

funds to local tribes and our local communities when in need and not. Is this something Koi Nation (Lower Laker Rancheria) does for their local communities currently?

There has been widespread opposition from federal, state and local officials, including Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, state Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson, and U.S. Senator Alex Padilla. The Koi Nation casino project would increase, traffic, noise and crime in our community as well as the Koi Nation casino project depreciating our property values. Considering we live in one of California highest area codes for earning a livable wage and purchasing property, that would cause immeasurable harm to the county and state for years to come.

The Koi Nation casino project would cause environmental harm that will effect the surrounding area tremendously for the entirety of their presence and beyond. While the Koi Nation simultaneously claims they worry for the environment. Filing lawsuits in Lake County in fear of desecrating cultural sites and causing environmental harm. This is hypothetical. How can they accuse one of something they are doing?

The original name of the Koi Nation Tribe was Lower Lake Rancheria. The tribe changed its name in 2012. Koi translates to the, "people of water". No local tribal members in Sonoma County and Mendocino County ever hear of or knew of a Koi Nation, only Lower Lake Rancheria. It seems like a calculated name change to deflect where they are originally from. They had and denied countless opportunities to have a casino and land in Lake County, that they denied. Koi Nation wants to land shop in others tribes territory no matter the cost. It's not about what they claim as migration of their tribal members. It's about casino shopping. They have on record multiple different attempts of trying and failing to casino shop on other tribes territory and they failed. I would gladly support them building a casino for the Koi Nation In Lake County where they are from.

Koi Nation whose traditional territory includes the city of Clearlake and Lower Lake, sued in March to halt the city's projects for the 18th Avenue extension, which is related to a new hotel development. It filed another suit in July regarding the Burns Valley sports complex and recreation center project, alleging the city has not conducted state-required consultation with its local tribal government. Specifically, the tribe has pointed to AB 52, the Tribal Cultural Resources Bill of 2014, which requires that, as part of CEQA, public agencies must consult with a local Native American tribe when a project will have significant impact on tribal sites.

Thank you for considering this when making the final decision,

Teara L.F. Steele-Smith

From: Isaiah Jamison <isaiah_j95@yahoo.com>
Sent: Tuesday, December 10, 2024 10:29 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shilo Resort and Casino

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Dear Chad Broussard,

I am writing this letter because I, among many others in the city of Windsor, oppose the Koi Nation Casino Project. I speak for the community when I say that this casino would be a very negative addition to this beautiful city. I am sure you are very busy, but I hope you will take a moment to read what I have to say.

This casino is hoped to be built in the heart of Windsor. Its location will greatly affect the livelihood of all who live in the surrounding area. It will impose a risk of danger to the residents in the vicinity due to the increase in crime a casino would bring, as well as the risks that come from a large construction project. It would also drastically reduce the property value of the hard-working homeowners nearby. A lot of families are already struggling in this economy, and it would be devastating to them if they lost the financial cushion that the equity of their homes provide them. It would also cause serious concerns with the added traffic it would bring to the city. I do not believe that Windsor has the proper infrastructure to support this influx of traffic.

A project of this magnitude would also require a very large amount of water. If the casino and hotel were to open, I am worried the nearby homes, businesses, and farms would have a shortage of water in the hot summer months. Our community has a great number of vineyards that provide a significant amount of support to our community. A loss of water to those vineyards would be devastating to Windsor, as well as other cities in Sonoma County.

Last but not least, there are several schools near this proposed casino. The number one priority in any community is the safety and well-being of our children. As a parent in this community, I am very concerned about the affect this would have on them. I have three children, as well as many friends and family members whose children attend these schools. We are all scared of the potential threat this would have on them.

I have high hopes that you will consider these issues before allowing a tribe from a completely different county to build a casino in our city. The tribe that is indigenous to the land in Windsor also oppose this casino, because it is not the Koi Nations land. They have worked hard to claim this area as their ancestral land, and it would be a shame for another tribe to come in and claim it as their own. Thank you for taking the time to read the concerns that I have as a member of the community.

Sincerely,
Isaiah Jamison
9698 Abalone Circle
Windsor, CA, 95492

From: Leticia Jamison <lettybuen@icloud.com>
Sent: Tuesday, December 10, 2024 10:38 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Clearlake Koi Nation Shiloh Resort and Casino Project

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Dear Chad Broussard and hello my name is Leticia Jamison from Lytton Band of Pomo Indians. I live in the town of Windsor where Koi Nation of Clearlake county proposed a new casino development including a 2500 slot machine floor with a 400 room hotel and spa. Sonoma county can not accommodate an infrastructure of that magnitude in any way, shape, or form. For as long as I can remember Windsor had that calm historical ambiance, creating a place to get away from the busy Bay Area lifestyle while still enjoying being close to a city lifestyle. Our newly build homeland that we fought so hard for will significantly be at risk and many other natives in this area have been in disbelief that a tribe from a different county can come and try to push agenda on our ancestral lands. We have multiple children and friends attending schools in this area that may cause harm to them. This development will cause way more traffic in our area at all times of the day because of operation hours being 24 hours a day 365 days a year. This would not only increase traffic but the noise and crime will significantly go up depreciating property valley in the beautiful wine country we hold pride in. As many people know, our area has been hit with major wildfires and this increased traffic will hold up evacuation process to our limited roads for all of us locals in a life or death situation. A project of this magnitude would cause so much environmental harm including all the water they may need to use alongside the everyday wastewater that will need to properly store and dispose of. Families and many businesses in our area are at risk in the event of a system failure and our quality of life worsens. The 4 other tribes living on our ancestral land at this time, Dry Creek Rancheria Band of Pomo Indians, Kashia Band of Pomo Indians, Federated Indians of Graton Rancheria, and Cloverdale Rancheria Band of Pomo Indians, are all in opposition of the Koi Nation Casino project, including numerous local, state, and federal elected officials. This list includes the Windsor Town council, Sonoma County Board of Supervisors, Governor of California Gavin Newsom, United States Senator Alex Padilla, state Senator Mike McGuire, Congressman Jared Huffman and U.S Representative Mike Thompson. It is urgent to put a stop on this Shiloh Resort and Casino project in an area where gaming is not eligible to protect our future generations from mass influx of unwanted visitors of that matter. We need to focus and heal the indigenous communities who are still here to this day on our land, in our county, the Sonoma County Native Americans, who are working to protect what has been lost and restore our cultural values. Thank you so much for taking the time and consideration of the locals of this area.

Sincerely Leticia B Jamison
9698 Abalone Circle
Windsor CA 95492

From: Maisie McCarty <maisiemccarty@hotmail.com>
Sent: Tuesday, December 10, 2024 2:13 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS comments, Koi Nation Resort and Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Sent from my iPad
December 10, 2024

Amy Dutschke, Regional Director BIA, Pacific Region
Chad Broussard, Environmental Protection Specialist, BIA

Dear Ms. Dutschke and Mr. Broussard,

We are Sonoma County residents, living in Windsor's Oak Creek subdivision, just 2 blocks north of the proposed Koi Nation Casino, to be financed, run and benefitted from by Oklahoma's Chickasaw Nation and to a lesser extent, the Koi Nation.

Since the property was purchased with a DNA (which is disingenuous) we did not know of the Chickasaw/Koi's intentions for the land until late 2022. Since then we have strongly and vocally opposed the proposed Koi Nation's fee to trust transfer of this unincorporated and designated community separator agriculture/ open space land. Joining our total community in this opposition are all five Sonoma County Supervisors, the Town of Windsor, the Governor of California, our local and national Assemblymen, our State Senator Pro Tem President and ALL other local indigenous tribes.

The BIA is not listening to concerns of the community about water supply, water table degradation, noise and light pollution, wastewater management, traffic congestion, wildfire risk and emergency evacuation routes, law enforcement, public safety and crime suppression. The FEIS is wholly inadequate, poorly worded, full of overly complex technical information and uses vague "best management practices" language.

The BIA has promised to consider public comment but has clearly not done that in the FEIS. The process is rushed and dismissive of our voices, the people who will be most directly affected by any such casino and resort. In addition the BIA expects all public comments within 30 days of the FEIS, which occurs during the busy holiday season, thereby precluding meaningful public input. We strongly urge you to extend the comment period to allow the community to properly respond.

This proposed project would do nothing to restore homelands to the Koi Nation, whose ancestral homeland is in Lake County and is 50 miles away from the proposed location. We feel strongly that local indigenous tribes deserve restored lands however the proposed project's location and indigenous homeland is on Southern Pomo land, not Koi Nation's.

There is only one way to prevent the severe environmental, social, cultural and emergency harm this project proposes. The BIA must approve the environmentally sound "no project" alternative in the FEIS.

Very truly yours,
Mary M. McCarty
L.W. Harrison
6251 Lockwood Drive
Windsor, CA 95492

From: Hal Moorehead <hal@fiberpipe.net>
Sent: Tuesday, December 10, 2024 7:11 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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PLEASE. NO! How many casinos do we have to have in Sonoma County? In the case of this project, it will completely change the climate of this town. It is way out of scale with the community and will dramatically affect the traffic burden, put unacceptable pressure on what goods and services are available to those who live here and it will eliminate the wonderful personality of this town. Can't you find an area with less existing casino density? Hal Moorehead and Jayne Peeters, Husband and Wife and Owners and Residents of 7213 - 16th Hole Drive, Windsor, CA 95492

From: Momo Enriquez <momoo112801@icloud.com>
Sent: Tuesday, December 10, 2024 8:46 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino

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I'm a local of Windsor emailing on behalf of the Koi Nation Casino project. It would be beyond disregard of Margie Mejia Lytton Rancheria Chairperson's hard work and dedication to the tribe and community, Not only have the tribe done numerous counts of deeds for the community but also for the surrounding areas. Margie Mejia fought years to create what she left behind for her tribal members and a legacy to the community. Koi nation would disregard all those hard working years and legacy that the town of Windsor stands for and denies what is proposed to be the Koi Nation Casino. It would create environmental harm to Windsor and what the tribe has already established for their members. We as the community stand and town of Windsor will fight for what we feel is right. Koi nation should NOT be approved for therefore would drastically harm Lytton Rancheria.

From: David Cohen <david@cohen.net>
Sent: Wednesday, December 11, 2024 7:07 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Te: Koi Nation Casino

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Mr. Broussard,

As a happy resident of Windsor, California who travels past, around and by the proposed site on an almost daily basis, I plead this is not a site for a large casino and hotel.

I do not oppose allowing Native Nations in general to create casinos as economic zones for their members. However, I do think it's important to consider where these mega resorts are located. Perhaps the BIA could encourage the Koi to locate closer to the airport in a more commercialized environment? Please reject allowing the Koi on to build at their proposed location. Traffic, noise, pollution, decreased property values, crime and widespread opposition should be considered.
Thank you.

David Cohen
Windsor,CA

David Cohen
408-499-7152
david@cohen.net
<https://www.DavidCohenGallery.com>
@DavidCohen1



"If you hear a voice within say you cannot do something, then by all means, do that thing, and that voice will be silenced." -Vincent van Gogh

From: CHRIS ROGERS <rogerscr@comcast.net>
Sent: Wednesday, December 11, 2024 7:23 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Lytton Rancheria Casino

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Mr. Broussard,

I'm writing you about my concerns regarding the Lytton Rancheria Casino proposal in Windsor, CA. I am a Windsor resident that lives in reasonably close proximity to the proposed site. Several concerns have arisen since the proposal of this casino took place. First, the amount of water this casino will need. Windsor, and Sonoma County in general, have endured several droughts over the past decade. We are constantly asked to conserve water usage to accommodate the minimal amount of water available in our reservoirs. Others, who may use ground water, are having to drill deeper and deeper to get their water, as the water tables underground are being depleted by the viticulture and farming communities in the county. What happens when they run the water table dry? Adding a casino that will use millions upon millions of gallons of water seems like an unnecessary addition of water usage in a place that can least afford to accommodate it.

Fires are another concern. The placement of that casino in close proximity to the hills that have had several fires pass through them in the past few years is scary to think about (not to mention they'll all have to use Hwy 101 like the rest of the residents to potentially escape) I've been evacuated twice in the past 7 years, and thankfully those were proactive evacuations, not like the reactive evacuation that Santa Rosa residents went through in 2017. I shudder to think of the chaos that would ensue if there was a reactive evacuation due to an immediate threat, and the log jam of traffic from thousands of additional casino visitors that could potentially prevent escape from the fire that could cost human lives! The risk is not worth the "reward".

My question is this, when is enough, enough? Allowing this tribe to place this expansive casino in place so people have ANOTHER place for gaming seems ridiculous, especially with 2 casinos within 20 minutes north and south of the location. Not to mention, they are a LAKE COUNTY TRIBE and not even from Sonoma County....but I'll leave that argument to the other local tribes that certainly seem to have valid complaints about the situation. With the on again off again drought situation, wildfires, and not to mention traffic, pollution and crime that are associated with casino build outs, I urge you to consider NOT APPROVING the buildout of this casino,

Sincerely,

Chris Rogers

7321 15th Hole Dr
Windsor, CA 95492

From: terri whetstone <sharpwhetstone@me.com>
Sent: Wednesday, December 11, 2024 7:28 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: My Husband Husband <david_whetstone@att.net>
Subject: [EXTERNAL] Koi Nation Casino Project

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Good morning Chad.

I am writing to you as a long time Sonoma County Resident. I normally would not reach out on such a subject, however I have grave concerns about the Koi Nation Casino Project in Windsor CA.

Let me start by saying that we are not 'anti-casino'. Not at all.

We are very concerned about this project, and the impact it will have on our community. It is proposed in a geographic area that is far from Koi Nations aboriginal lands. I believe that it not in keeping with how Casinos are supposed to be granted permission.

It is being proposed geographically in an urban area that logistically is not safe for the level of traffic this would cause. We have had multiple wildfire evacuations over the past decade. We personally have been hit by one, and evacuated three times, so we have experienced the traffic jams, fear, and brutality of those moments. This location would put lives in jeopardy should a wildfire occur. It could not handle the increased traffic should that happen.

It is being backed by the largest tribe in the country, far from Sonoma County California. That in itself, simply isn't in keeping with 'local' tribes being supported on casino projects.

This geographic location is opposed by federal, state and local officials.

The environmental impact in this beautiful urban area would be tremendous. The impact to local property owners would be extremely negative.

I most sincerely request that you reject this project in this geographic location.

Thank you

Terri & David Whetstone

From: Judi Wiggins <golfnjudi@yahoo.com>
Sent: Wednesday, December 11, 2024 7:50 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Casino

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NO on the proposed casino project in Windsor CA!!!!

[Sent from Yahoo Mail for iPhone](#)

From: Ann Sebastian <amarvelle40@gmail.com>
Sent: Wednesday, December 11, 2024 7:45 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino neat Windsor CA

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As a 26-year resident in the area directly adjacent to the proposed casino, I vehemently object to this misdirected project. The area is residential and the access road between Santa Rosa and Windsor, which will be directly impacted by this beyond-logic endeavor, is a two-lane road. This will destroy the semi-rural atmosphere of this northwest Sonoma County area. There is no reasonable solution other than the complete denial to the tribe that is unreasonably attempting to remake this residential area. Please consider these factors and others pointed out to you by any very concerned citizens.

Thank you.
Sincerely,

Ann Sebastian
amarvelle40@gmail.com
223 Firelight Ct.
Larkfield CA 95403
707 579-3934

From: Mary Grishaver <marygrishaver@gmail.com>
Sent: Wednesday, December 11, 2024 8:59 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Casino

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Dear Sir,

The last thing our area needs is another casino! There are already large ones close by.

The area proposed for this HUGE casino is inappropriate. It is adjacent to the Shiloh Ranch Regional Park which is a natural area gem full of wildlife. For instance, 118 species of birds have been reported in this wonderful park.

The impact on the park will be hugely detrimental. The casino site is currently a vineyard which is compatible with the park; a casino and large paved parking lot is not!

I live in Fountain Grove, and often drive down Redwood Hwy. The traffic will be awful. Redwood Hwy is not a big road!

Please stop this Casino!!

Thank you,

Mary Grishaver

From: Debra Antone <pomolady1@gmail.com>
Sent: Wednesday, December 11, 2024 9:19 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] KOI Nation

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I say NO to the reckless casino project of the KOI Nation.

Signed,

Debra Antone
Tribal member of The Kashia band of pomo Indians

From: Barbara Weir <barbaraweir@att.net>
Sent: Wednesday, December 11, 2024 9:24 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Windsor Casino

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Hello, I would like to voice my extreme dismay at the proposed building of a large casino/resort in Windsor. I have been a resident here for 30 years with my dad owning my property since the mid 70's and my children raised in the local school system. I love everything about this community and what it has grown into. It has a small town feel that makes it so inviting for families in particular.

I regularly hike through Shiloh Regional park and from the top enjoy the beautiful views and quiet reflection I am able to attain looking over our town. I drive by the proposed site whenever I head over to the park. The thought of experiencing the additional noise, pollution, traffic - with busloads of gamblers, etc is very disheartening to say the least.

Building a casino/resort close enough to the park, not to mention the surrounding neighborhoods is not at all in line with what our town has worked so hard to attain over the last 3-4 decades. It's the kind of glitzy greed and commercialism that brings nothing positive to humanity let alone our community.

I sincerely hope this project doesn't come to fruition as sadly that will probably be what our town will then be known for in the future.

Thank you for helping us fight the fight!
Barbara Weir

From: Faxon Bishop <fbbishop@hotmail.com>
Sent: Wednesday, December 11, 2024 9:44 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino Project

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Hello,
The Koi Nation casino project near Windsor, California may be the stupidest proposal in many years. The traffic and noise would be tremendously upsetting for the local community and the land is very far from the Koi Nation's original territory,
Please reject this terrible proposal.
Thank you very much.
Faxon Bishop
Healdsburg, CA

From: William Stites <cyclingandtennis@gmail.com>
Sent: Wednesday, December 11, 2024 9:46 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino

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Hello Mr Broussard

Sonoma County doesn't need a third casino and this one would be in the worst location I could imagine. That area of Windsor would be destroyed in so many ways. The small town charm with vineyards would be decimated. There are 2 large apartment complexes near that area and a large sports field. There is not enough parking in that area now. Old Redwood Hwy is very narrow and there are lots of bicyclists that travel that road. It would become more dangerous. Bring up a google map of the area and you will see what I'm talking about. This area of Sonoma County is known for its small town charm, wineries and vineyards. There are lots of small subdivisions in the area that would be harmed in so many ways. If you lived in the area what would be your thoughts? The town of Windsor would no longer have a small town charm.

Thank you for taking my thoughts into consideration.

William Stites

From: Diana Dodson <dianadodson60@gmail.com>
Sent: Wednesday, December 11, 2024 12:38 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] NO Casino in Windsor

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You need to come to this location to see why a casino there is a bad idea. It is a lovely area right next to a residential area where children live. The infrastructure is not in condition for the increased traffic. Including water issues. I've read the city will be responsible to widen the road. We already have budget issues. We have several casinos available for those who like that activity. The Koi nation can build elsewhere. The rich tribe in Oklahoma can buy property in a more suitable location. Please do right by us.
Diana Dodson

From: Kay Marquez <kezmarquez@gmail.com>
Sent: Wednesday, December 11, 2024 1:33 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino opposition

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I have lived in Windsor since 2002 and since then two casinos have opened up one north of me and one south of me and they're not very far apart. I see no reason to add another casino, especially to Shiloh Road, which is across from a residential district Turns into a 2 Lane St. that has tons of traffic going north and south on the old Redwood Highway and east and west on Shiloh. It's a huge safety factor for all the people living in that neighborhood, in the newly built apartments going up all the existing people that use that artery to get on the freeway in the event of any Evacuation. I

am opposed to this and feel there should be other ways that the Koi community can utilize this land for profit.

Gambling is an addiction and it just creates crime and we do not have a large enough population to support three casinos. Where else can you find casinos in such close proximity to such a low population base?

We do NOT need any more casinos built in this area.

Sent from Catherine "Kay" Marquez
Email: Kezmarquez@gmail.com
Cell/text 707-484-4526

From: Julie JC <jaqcol15@gmail.com>
Sent: Wednesday, December 11, 2024 2:29 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Hello Mr Broussard -

Please share the attached comment letter with Amy Dutschke, Regional Director, Bureau of Indian Affairs.

I will send it to her as well via paper; your email address was provided as the way to reach her via email correspondence.

Thank you!

Julie Jaquiss-Collins

JAQCOL15@gmail.com

December 11, 2024

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

Chad Broussard, Environmental Protection Specialist, BIA
Chad.broussard@bia.gov

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

Dear Regional Director Dutschke and Mr. Broussard:

There are too many unanswered questions and concerns about the proposed Koi Casino in Sonoma County to limit to a 30-day comment period, especially at year end. You have promised to consider public comments, but there is not any evidence in the current FEIS that you have incorporated these concerns. Our communities and local tribes deserve better treatment from the BIA!

We respectfully request an extension of the public comment period to allow the community sufficient time to respond thoroughly and time for the BIA to take concerns into account.

Comment: We are Sonoma County residents, and we strongly oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project. This project is not suitable for its proposed location. Local indigenous tribes have also highlighted the profound and harmful effects this project will have on their cultural resources.

To date, the Bureau of Indian Affairs (BIA), has not adequately addressed very serious concerns that have been raised by local communities and tribes, or addressed them at all.

The BIA, while trying to do the right thing for the tribes and the community, does not seem to hear or acknowledge the very real concerns and unanswered questions about the project from the communities who will feel the biggest impact.

Many mitigation measures outlined in the Final Environmental Impact Statement (FEIS) released on November 22, 2024, are vague, framed merely as "best management practices" without any enforceable guarantees. That's unacceptable.

You may not be aware that the proposed project is just across the town-county border (just across the street) with the Town of Windsor (25,000 population). Therefore, the town (and other small communities around the project) will incur *significant* burden on emergency services (ambulance and fire), traffic impact, law enforcement, earthquake/fire evacuation, housing, water, and other impacts of the Koi project, **with no increase in tax revenue to address these very real needs/issues.**

Further, you may not know that Sonoma County is 1500 square miles across mountainous terrain, and almost 500,00 people, so the emergency services and other resources of the county are shared across a very wide and challenging area.

Today, our citizens who live on county land outside of town limits already wait 20-30 minutes for a county sheriff to arrive at an emergency call. *What will happen to those wait times with a project such as the one the Koi are proposing?*

Again, Sonoma County and the Town of Windsor are not the only voices highlighting the challenges and unanswered questions about this project. Our local indigenous tribes have also highlighted the profound and harmful effects this project will have on their cultural resources. *The ancestral homeland of the Koi Nation lies more than 50 miles away in Lake County.*

The only way to prevent the severe environmental, social, and cultural harm this project poses is for the BIA to approve the environmentally preferred "no project" alternative in the FEIS.

Again, we appreciate that you have promised to consider public comments, but we don't see any sign in the FEIS that you have incorporated these concerns. The current process feels rushed and dismissive of the voices of those who will be directly affected.

The 30-day comment period is particularly dismissive, given that it falls during the busy year-end and holiday season, effectively limiting meaningful public participation.

We demand an extension of this period to allow the community sufficient time to respond thoroughly, and for the BIA response to get more specific than "best management practices" without any enforceable guarantees. Our tribes and communities deserve better.

We appreciate your consideration.

Sincerely,

Dan Collins and Julie Jaquiss-Collins
Windsor, CA 95492
JAQCOL15@gmail.com

From: Hottel <hottel@sonic.net>
Sent: Wednesday, December 11, 2024 2:36 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Hottel <hottel@sonic.net>
Subject: [EXTERNAL] Koi Nation casino

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NO, NO, NO! We do not want another casino surrounding us!!!!

We have three now thank you.

Why should the desire to make a lot of money be valued over the common good???

We have played this game for far too long.

Gene A. Hottel

Jodi L. Hottel

<hottel@sonic.net>

From: Terry Hunder <hunderbunder@yahoo.com>
Sent: Wednesday, December 11, 2024 3:29 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Windsor Casino

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Sent from my iPhone: Building a casino project of that size in Windsor is the worst idea ever. Here are just a few reasons why: crime, location, infrastructure can't handle all the traffic as there is a huge apparent complex on the corner of Shilo Road and Old Redwood Highway, there's a very nice ballpark at the same corner for families can have their kids teams play and that will be closedown eventually so, bad for families. Northern California is prone to wildfires, how are people supposed to evacuate? Also, don't need any more casinos in Sonoma County. It will just downgrade the whole area. People with alcohol and gambling addiction don't need another casino to go to.

From: Allan Cory <allanjcory@gmail.com>
Sent: Wednesday, December 11, 2024 3:41 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] No to Koi in Sonoma County

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Please--enough! This is not an ancestral ground for the less than 100 members who want to capitalize on bussing in clientele from the Bay Area to frequent Sonoma County--we already have enough Casinos--probably more than the number of tribes which regularly inhabited the area. We don't need this Lake County import planting another gambling den in our county.

Allan Cory

From: Pamela Higi <pamhigi@gmail.com>
Sent: Wednesday, December 11, 2024 3:50 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Fwd: Koi Nation Casino

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> Hello Mr Broussard

>>

>> Sonoma County doesn't need a third casino and this one would be in the worst location I could imagine. That area of Windsor would be destroyed in so many ways.

>> The small town charm with vineyards would be decimated. There are 2 large apartment complexes near that area and a large sports field. There is not enough parking

>> in that area now. Old Redwood Hwy is very narrow and there are lots of bicyclists that travel that road. It would become more dangerous. Bring up a google map of the area and

>> you will see what I'm talking about. This area of Sonoma County is known for its small town charm, wineries and vineyards. There are lots of small subdivisions in the area that

>> would be harmed in so many ways. If you lived in the area what would be your thoughts? The town of Windsor would no longer have a small town charm.

>>

>> Thank you for taking my thoughts into consideration.

>>

>> Pamela Higi

From: Mickles Enterprises Bookkeeper <2mebk@sbcglobal.net>
Sent: Wednesday, December 11, 2024 3:57 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Casino

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We the undersigned urge you to deny the KOI Nation to build the casino in Windsor California for the following reasons;

- It is well established that organized gambling preys upon those folks least able to afford such stupidity
- The quiet community of Windsor does not need increase traffic noise or crime, it is presently of any of these.
- Specifically the increase in poverty caused by gambling loses will depreciate local property values.
- How can a tribe place a casino on any land which is not a separate nation?

Sincerely,

Lindsay Mickles

From: Ken and Terry Marshall <kenandterrym@sbcglobal.net>
Sent: Wednesday, December 11, 2024 7:05 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino Project near Windsor.

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I am opposed to the Koi Nation Casino Project near Windsor.

I do not understand why a Casino would or even could be established in a residential neighborhood. It makes no sense. It should be established in a commercial part of a town or city.

The closest freeway entrance/exit is on Shiloh - where it is often CLOSED due to flooding during the winter. Shiloh is a TWO LANE ROAD. How can it possibly handle the number of people that would go to a casino? It barely handles daily traffic of students going to school or residents going to Kaiser hospital.

When Windsor was evacuated during the Kincade fire in 2019, it took HOURS to get to highway 101 South because there were so many neighborhoods that only had the option of only two entrances to highway 101 South.

It is my understanding that the Indian tribes that actually had homelands in Windsor, were not consulted, and that the Koi tribe does not have historical residency here.

Casinos would bring crime to our beautiful small town. The valid tribes, residents and town council do not want gambling here. We have very little crime. Gambling is guaranteed to bring crime to our small town.

I beg you, please do not grant the Koi Nation casino project to our small town. Guaranteed, it would our ruin our community.

Thank you for your consideration.

Sincerely,

Terry Marshall
9554 Vancouver Lane
Windsor, CA 95492

From: Joan Tabb <joantabb@gmail.com>
Sent: Wednesday, December 11, 2024 7:38 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] NO to the Casino project near Windsor!

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Dear Chad Broussard,

It is of utmost importance that we NOT proceed with development of the casino near Windsor!!

The proposed Koi Nation casino project would be very harmful to our community:

- increased traffic
- environmental harm
- there was NO consultation with impacted tribes
- it's land that is far from the Koi nation's aboriginal territory
- there's opposition from federal, state and local elected officials.

This is a terrible idea and we already have more than enough casinos in our region.

Thank you for your consideration.

My family, neighbors and friends feel very strongly about this...it is a misguided project.

Joan Tabb Waisbein
 Santa Rosa, CA

--

* * * * *

Joan Tabb

Author | Always Sam

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From: Jeff Bertoli <treamicizin@gmail.com>
Sent: Wednesday, December 11, 2024 8:04 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino Project

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Dear Mr. Broussard,

I hope this finds you well. I am writing to express my deep concerns about the Koi Nation casino project. Please allow me to begin with a few facts about me.....

- I am 65 years old.
- I am a 4th generation Santa Rosa native with 2 grandchildren representing the 6th generation of our family here.
- I come from a farming family. We farmed apples, prunes, vegetables, and Christmas trees in Santa Rosa and Sebastopol for 3 generations.
- I have owned my home and lived in the unincorporated area of Santa Rosa referred to as Larkfield and/or Wikiup for over 30 years.
- My home is approximately 2 miles from the proposed Koi Project.
- I have many friends who live directly across the street (Shiloh Rd. and Old Redwood Highway) from the proposed project.
- I am not a gambler, never have been.
- I am not at all a proponent, never will be, of casinos/gambling but I do accept the fact that we, the people, at the state and federal level, have approved Indian gaming.

Sir, the proposed location of the Koi Nation project will, in my humble opinion, devastate many hundreds, if not thousands of residents near the proposed location exposing them to a devaluation of their property, increased noise, excess traffic, more crime, emergency evacuation constraints, and environmental decay. It simply boggles my mind that this could be even remotely considered with any degree of consciousness let alone any respect for the areas and residents that surround the proposed project location. This is a residential area near regional and city parks! The two other major casinos in Sonoma County reside in more remote, non-residential areas and thus have minimal impact on the surrounding communities. Kudos to them as this is how and where it should be done! Not in the middle of residential communities!

I have absolutely no attachment to the positions the local tribes are making about "reservation shopping" or their inability to provide inputs to the project. I understand their concerns but they are not relevant to me. What is relevant to me is the impact on the people, which obviously includes me and my family given my close proximity to the proposed site, businesses and the local environment that will be adversely and sadly impacted by this project if it is approved.

As I also referenced above, Indian gaming has been approved and is, unfortunately, a part of our national life. So be it. However, that doesn't make it right but it makes it right....if you know what I mean. As a result, I support the Koi Nation, or any other tribe for that matter, in their pursuit of their rights. So be it. However, I do not support the Koi Nation project at this proposed location!! It is wrong and disrespectful to our community as a whole.

I implore the BIA to show some respect for the surrounding community and environment and deny this location for the Koi Nation project!!

Most respectfully,

Jeff Bertoli

From: judith Rousseau <jrousseau12@hotmail.com>
Sent: Wednesday, December 11, 2024 9:56 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr Broussard

Please consider the local environment that would be impacted by this huge project. Shiloh Ranch Regional Park is immediately adjacent to this property. This park is one of the wildest and most beautiful of the Sonoma County regional parks. The noise, traffic, pollution and high water use would not only greatly affect numerous neighborhoods but also the quiet and the ambience of the park itself and its many animal inhabitants. It is so wrong to allow this massive casino to be built so near such cherished wild parkland.
Thank you for listening
Judith Rousseau
Graton, CA

From: Shannon Schiller <slschiller@gmail.com>
Sent: Thursday, December 12, 2024 5:06 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Koi Nation Shiloh Resort and Casino

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Dear Regional Director Dutschke and Chad Broussard

I have been a Sonoma County resident all my life and a resident of Windsor for 20 years. Lately we have been inundated with Indian tribes wanting to turn our town into a casino. The proposed location is right in the middle of a neighborhood, next door to a state park and down the street from an elementary school. Let me ask you both, is this what you would want if it was your home. I strongly oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project. We are a real community, not just land to be exploited. The koi nation homelands isn't even here, it is more than 50 miles away from us!

The Bureau of Indian Affairs (BIA) is not listening to the concerns of the community. Massive opposition exists at every level—from the state down to individual neighborhoods. Sonoma County and the Town of Windsor have raised critical concerns regarding water supply, wastewater management, traffic congestion, wildfire risk, and evacuation routes, law enforcement and public safety, housing, and broader economic impacts. Local indigenous tribes have also highlighted the profound and harmful effects this project will have on their cultural resources.

You have promised to consider public comments, but it is evident in the FEIS that you have not. The current process feels rushed and dismissive of the voices of those who will be directly affected. The 30-day comment period is particularly outrageous, given that it falls during the busy holiday season, effectively limiting meaningful public participation. We demand an extension of this period to allow the community sufficient time to respond thoroughly.

Sincerely,
Shannon Schiller
218 Flametree Circle
Windsor, ca 95492

From: judy nassimbene <jjbene247@gmail.com>
Sent: Thursday, December 12, 2024 8:26 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Casino project in Windsor

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This serves to let you know the disastrous effect effect a casino would have on our community. The proposed site is in the MIDDLE of a family neighborhood, soccer fields church etc. In other words it is NOT a place to build a casino. Go find somewhere else where a family neighborhood won't be impacted. We don't want it and this proposal will cause irreparable harm to our community. Traffic. Impact on fire emergency access/egress. Socially negative our schools and children. Not to say crime and increased traffic in an area not suitable for thank you for considering this

From: Jennie Orvino <jennieo@sonic.net>
Sent: Thursday, December 12, 2024 9:47 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Comment on KOI Nation Casino Project

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I'm writing, as a resident of Santa Rosa, Sonoma County, CA. The Koi Nation casino project would be harmful to our community because of environmental harm, increased traffic, noise and crime. There has been no consultation with impacted tribes, the land is far from Koi Nation's aboriginal territory and there is widespread opposition from federal, state and local elected officials. I support Indian rights but in this case, two major casinos is enough in our area.

Jennie Orvino
1123 Grand Ave
Santa Rosa, CA 95404

From: David Banuelos <david.sonoma@outlook.com>
Sent: Wednesday, December 11, 2024 10:43 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] KOI Nation Proposal Comment

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For Chad Broussard and all else whom this may concern,

I write this letter in concern, on the matter for the proposed attempt by the “Koi Nation” to look for and build on land that is NOT in their ancestral territory but rather just a convenient location. To disrupt the natural environment and build a casino in an already congested and residential area here in Sonoma County will be a disservice to all of us including the native people indigenous to the proposed area. As a lifetime citizen, born and raised in Sonoma County with roots in the affected area I urge the BIA to respectfully and highly consider the very real, very valid concerns and the negative impacts this project will have on the residents as well as the environment that we so cherish and take pride in as a community.

Like majority of residents and local, state and federal officials, I share my opposition that is so widespread (for good reason) for this project. There are a multitude of concerns for all aspects of this proposal. These concerns include the complete disregard for the voices of the many local native tribes and peoples. I have heard from other indigenous residents expressing their frustration on the fact that the Koi Nation have been reservation shopping. This tribe was formerly known as the Lower Lake Tribe because they are originally from Lake County, California which is a completely different county than the proposed site here in Windsor, California. This casino project is detrimental to a community already battered by the traumatic events of wildfires very prone to this area especially in the proposed site area. From traffic congestion, noise, and the increased crime that will come from this it is extremely important to understand the consequences this could have on our health and well-being. The degradation of quality of life from increased pollution, sleep disruption, stress on families from the daily traffic and the worry of limited evacuation routes in the event of future wildfires that are naturally more likely to occur in this region. Property values will depreciate due to the out of place nature of this casino, there is simply no room for a casino in a densely residential neighborhood close to schools and parks and may increase the risk of pedestrian harm from the high probability of casino patrons driving under the influence no matter the time of day.

As do so many local residents, I firmly believe the Koi nation’s proposed casino project would cause significant environmental harm and damage. Many residents in Sonoma County understand the vulnerability of our ecosystems and geographically we are

located in an area of environmental diversity. The threat of climate change already looms over us and as a state that prides itself on working towards a better future, this casino project will only exacerbate everything we are fighting for and put all the progress at risk economically and physically. It is my hope that the BIA can and will do what is right for the majority of the people who strongly oppose this (let's call it what it is) brazen attempt at a land grab. I hope that the BIA will listen to us Natives who plead to be heard. This time, we have many by our side, from Governor Gavin Newsom, Sonoma County Board of Supervisors, Windsor Town Council, State Senator Mike McGuire, Congressmen Jared Huffman and Mike Thompson, U.S. Senator Alex Padilla and so many other citizens of our state and county. If BIA decides in favor of this project, it sends a message to all other tribes and administrations that there is no hope and no one to believe in to preserve the cultural traditions, values and ethics of California's indigenous populations. This is a plea to the BIA to please respect the will of the people and join us in opposing a casino in our neighborhood as the case for a local tribe in the Town of Windsor who listened to the concern and agreed to never build a casino in this area. Thank you for taking the time to read and consider my comments.

David B. -concerned citizen

From: Janice Mastrangelo <gello4687@gmail.com>
Sent: Wednesday, December 11, 2024 11:27 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] windsor ca casino

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hi chad

to be brief! california has enough casinos period. we don't need anymore.

too much traffic. drain on resources.

have a good holiday and please don't approve anymore casinos in california!!!

jan mastrangelo
4687 hwy 128
geyserville ca 95441

From: Charles Zweig <diamondsof5@yahoo.com>
Sent: Wednesday, December 11, 2024 11:56 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino Project near Windsor California

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Dear Chad,

My name is Charles Zweig. My family and I have lived in Windsor, CA for 9 years. My wife and I have a 6 year old son, a 3 year old daughter, another 8 month old son. We absolutely love Windsor and moved here because of its small town feel and proximity to Santa Rosa, a larger city. We live only a few blocks from the proposed site of a potential new Casino Project spearheaded by the Koi Nation. We are terrified for our community and family should this casino be approved. The increased traffic alone would not be supported by the roads leading to and from the site. There are many new major housing developments being built across the street from the casino site which will already put a strain on the local infrastructure. I am also concerned with the inevitable rise in crime, drunk driving, and other social issues that come with a casino. The site for this casino is LITERALLY across the street from home residences. Please. I urge you to find another site for this casino that is not so close to families, homes, and a community that thrives in the small town charm that Windsor has possessed since its creation.

Thank you for your consideration and understanding.

Sincerely,

Charles Zweig
High School Teacher
Windsor, California

From: deakon2@comcast.net <deakon2@comcast.net>
Sent: Wednesday, December 11, 2024 11:59 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] No to casino near Windsor

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Hello Chad – We live in Larkfield near Windsor and wish to express our vehement opposition to the proposed casino at Shilo Rd.

Traffic is already miserable on Old Redwood Hwy and with increased building and hospital expansions, will get much worse soon.

Sonoma county does not need another casino Period.

Increased crime and crowds as seen in Rohnert Park due to the casino there, and another one in Geyserville too are prime examples of the illogic of building yet another monstrous gambling facility on a two lane road.

The quality of life for people who have lived here for generations will suffer, not to mention the decreased property values and further degradation of our society in general with people gambling away their hard earned money.

We don't need it and if you are doing your job effectively in understanding the enormous negative impacts of this project, you will stop it.

Thank you,
Dennis Kerby

From: Sheri Graves <slgraves26@gmail.com>
Sent: Wednesday, December 11, 2024 12:11 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation

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I do not believe that a Native American tribe should be allowed to establish a casino far from its aboriginal territory, particularly when there is widespread opposition from federal, state and local citizens and elected officials. For this reason I am opposed to Koi Nation's bid to build a casino near Windsor.

Sheri Graves
2466 Westvale Court
Santa Rosa CA 95403

From: wesley downing <wddownin@yahoo.com>
Sent: Wednesday, December 11, 2024 4:22 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Dangerous Koi Nation Casino and the dangerous precedent - Windsor Ca

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Chad,

I am reaching out in hope's to convince you not to approve the proposed Koi Nation casino in Windsor. There are many reasons why not to improve including the danger to the surrounding residential communities, increase in crime, and most importantly, setting a dangerous precedent of allowing any Indian Nation to just buy any piece of land, no matter where, and building a casino on it.

The Koi Nation is not historically from the Windsor CA area and all they are doing is trying to find a way to build a casino anywhere they can. They randomly bought a piece of land in Windsor after being shot down in the lake county, where they are historically from. If you allow this casino to happen, what's to stop another Indian tribe from buy any piece of land, no matter if they are historically from that area or not, and building a casino on it. They will use this project, if approved, as a way to say "hey, the Koi Nation did it in Windsor, so we can do it here too". Other local tribes are providing historical information that is providing that this tribe is not from sonoma county and has no right to these lands. It should be noted that other local tribes are against this project as will. This project, if approved, will cause shock waves throughout the US and your name will be on it.

Another reason why this project shouldn't happen is that the land that the proposed casino is going on is surrounding by a park, residential housing, and a church. To the north of this project is a community park where it for little league baseball and youth softball. Next to the park is residential housing, which runs for the whole width of the new casino lot. Kiddy corner to the lot is newly built residential apartments. To the west is more homes and a church. Allowing this casino would bring more crime, drugs, and traffic to this area. Just look at the crime rate of the city of rohnert park. They had a new casino go in not to long ago and now all you hear about from that city is the drugs, prostitution, and crime that happens in the area around the casino. We don't want those things where we have kids playing and next to peoples homes.

Last thing is the strain this new casin would put on the small town of windsor. With already limited water resources for not only Windsor but the surrounding communities, do you think a 500 room hotel and casino will help that? What about the sanitary system? Air quality would definitely go in the wrong direction as hundreds of more cars would be coming into Windsor each day. The EIR report that was done, which was a joke of a report and should be reviewed for misinformation and not correctly stating the corect impacts this casino will have (i work on projects that have EIR reports done and this one was the worst i have ever seen), does state that if this casino goes in, the street adjacent to it would need to be widen to a 5 lane road, two lanes each way and another for turning. That is the road that provides access to the park and residential areas. Can you imagine the traffic that will happen at the light after a big event? Can you image if there was another fire in the adjacent foothills like the ones that happen only a couple years back? There would be dead stop traffic and no one would be able to get out of an area that was almoat burn down the last time.

Nobody in this community, county, or state wants this casino. Nobody thinks it's a good idea and I hope that the people that represent the voices of this community are actually listening and are doing everything in their power, including you, to make sure that this casino doesn't get approved. Ask yourself, who benefits from this casino and who gets hurt the most if it goes in. The people who live in this community

get hurt and the people who benefit (Kio nation) get to profit and watch as the town of windsor turns into a wrecked and crime ridden community.

PLEASE DO NOT APPROVE THIS PROJECT.

Best regards,

Wes D.

[Yahoo Mail: Search, Organize, Conquer](#)

From: chapman@vom.com <chapman@vom.com>
Sent: Thursday, December 12, 2024 9:30 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard: Under no circumstances should the Koi Nation casino project be developed near Windsor. This is an irresponsible project that is a detriment to the community and we all know the many reasons why - Decreased property values, crime, noise, traffic and the environment. Additionally, this is a far fetched attempt for a land grab that has nothing to do with the original land of the Koi nation group.

Veto this proposal!

Regards,
Audrey Chapman

From: Gloria Heinzl <gloria_heinzl@sbcglobal.net>
Sent: Thursday, December 12, 2024 12:03 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] No to Koi Nation casino

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I am writing to lodge my disapproval of Koi Nation's proposed casino project near Windsor. A huge casino, 400 room hotel and parking does not belong in a highly sensitive area, both for environmental reasons and what is a longtime neighborhood. The 2017 Tubbs Wildfire came very close to this area. We lost our nearby home in this fire which was followed by wildfires in subsequent years.

There are 2 existing casinos within a short driving distance. Sonoma County and its residents do not want a 3rd one squeezed into the rural neighborhood.
Thank you for your consideration.
Gloria Heinzl

From: Nancy Hair <doghairnancy@yahoo.com>
Sent: Thursday, December 12, 2024 11:37 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Another casino in Sonoma County?

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We already have TWO/enough casinos. One is enormous and is already pushing the other casino into bankruptcy. Now a little band ("Koi Nation") that is from Lake County...not Sonoma County... is pushing for a THIRD casino. Why on earth would these outsiders, who are backed by Cherokee Nation, another out-of-area group, have any right to destroy a Sonoma County neighborhood with increased traffic and fire danger....and threaten the livelihoods of the 2 existing casino owners? It's time for Indians to find business ideas besides gambling and alcohol.

Nancy Hair
Sebastopol CA

From: EMILY MCCUTCHAN <emccutch@comcast.net>
Sent: Thursday, December 12, 2024 12:30 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

My name is Emily McCutchan, a 5th generational Sonoma County resident. The McCutchan family settled in Windsor from back East in the mid- 1800's. I am strongly opposed to the development of the Shiloh Casino Resort. Rather than expound on the fiscal impact in our larger community of Sonoma County which currently supports two major casinos owned and operated by local tribes, I will focus on the local impact as a 20 year resident and homeowner in the local community of Windsor.

Within the last decade, the town of Windsor has approved a large residential development on the west side of town off of Windsor River Road that is owned and developed by the Lytton Rancheria Tribe, a local tribe. For more information, <https://www.lyttonrancheria.com/project>. The location of this development is in a very spacious, low traffic road connecting downtown Windsor to Eastside Rd.

However, the proposed site for the Shiloh Resort and Casino Project is located in a high traffic, congested area between Old Redwood Highway and Faught Road which leads to the exclusive **Mayacama Golf Course** and **Shiloh Regional Park**. This area of SE Windsor off of Shiloh has 500 homes in close proximity. *To add 500 additional homes plus a casino has huge negative implications for our local community of Windsor.*

Not only will it cause more traffic and congestion entering and existing 101 at Shiloh which is all ready a bottleneck with a large commercial area including Walmart and additional new businesses, it will cause more traffic and congestion for current homeowners in the area, as well as visitors to Shiloh Regional Parks.

Shiloh Regional Park entrance is right at the cross streets of Faught and Shiloh Road. With over 8 miles of hiking, biking, and equestrian trails on over 850 acres, this is one of the most popular regional parks in Sonoma County. <https://parks.sonomacounty.ca.gov/visit/find-a-park/shiloh-ranch-regional-park> As a resident of Windsor and avid hiker, this is one of trails I hike on a weekly basis. The main access to this beloved regional park is Shiloh Road right past the proposed Shiloh Casino Resort.

The last thing we need in Windsor, California is a casino with 500 homes right smack in an existing residential area with nearby agricultural and regional park land which needs to be preserved.

The old say, "oil & vinegar" don't mix. Neither does a "casino & preserved regional park lands" that not only the residents of Windsor enjoy on a daily basis, but the entire population of Sonoma County.

Preserve our natural beauty and peace of our regional parks. This is NOT the location for a casino in the heart of our community and park area!!

Sincerely,

Emily McCutchan
415-408-8827
1204 Mitchell Ln.
Windsor, CA 95492

From: Kip Zook <kipzook@icloud.com>
Sent: Thursday, December 12, 2024 1:14 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Chad,

The Windsor Community does not want the Shiloh Casino Resort!

The environmental impact will be major when it comes to the water supply, traffic, and well being of the people residing in the neighborhood next to the proposed site.

Safety concerns regarding crime are a major concern.

The history of the Koi Nation and their heritage is in Lake County, 50 miles away from Windsor.

Sincerely,

Kathryn Zook
Windsor Resident

From: judith gage <judith.gage@sbcglobal.net>
Sent: Thursday, December 12, 2024 2:52 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Windsor 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 say that you must not allow plans for the Koi nation casino project in Windsor California to proceed. I can hardly think of a worse location for a casino. The increase in traffic, noise and crime and particularly the environmental harm that would result are unconscionable. The traffic in this area is already a problem. The construction and operation of a casino at this location is just plain wrong. Furthermore, the Koi nation has no claim on this particular piece of land. Please do the right thing. This is a neighborhood that would be completely disrupted. Sonoma County already has its share of casinos! Please take the life of the community into consideration and not allow this.

Judy gage
3433 rolling oaks rd
Santa Rosa ca 95454
707-332-9502
Sent from my iPad

From: RICHARD BOYD <richard11boyde@comcast.net>
Sent: Thursday, December 12, 2024 3:14 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, 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,

Attached are my comments regarding the Koi-Chickasaw casino project in Sonoma County.

Sincerely,
Richard N. Boyd
Grey Skyhawk

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

Dear Mr. Broussard,

I am writing to voice my strong opposition to any of the proposed projects of the Koi in Sonoma County. My reasons are many, but I will focus on the ones I believe to be the most important. First, though, let me establish my credentials. I am an honorary Native American, which I was awarded because I helped orchestrate a solution between astronomers and Indians for a telescope on an Arizona mountain. I generally support the goals and wishes of Indian Tribes. But only when they don't attempt to violate existing traditions, legal mores, and basic logic.

The traditions require that a Tribe establish their casinos near their homeland. Sonoma County is not the Koi homeland. That is Lake County. The Koi are arguing that they should be allowed to build a casino in Sonoma County because they passed through this region in their travels. But that's a deception. Passing through does not establish them as living here.

Furthermore, I believe their entire proposal is based on deception. The Koi Tribe is extremely small, less than 100 members. They couldn't possibly operate a casino as large as they are proposing, or even direct building any of the three possible options they propose. And they couldn't possibly operate the casino complex that constitutes either of their first two proposals. It might be argued that they could direct construction of the third alternative, but if that were approved, is there any doubt that they would be back trying to expand their village into some form of the casino complex they really want?

I believe the answer to that is obvious. They have "partnered" with the Chickasaw, a large Tribe from Oklahoma with a complex of casinos. The Chickasaw certainly have the expertise to operate a large casino complex. However, their involvement in the Sonoma County project would make them the dominant partner. Indeed, the Koi become essentially irrelevant with the Chickasaw involvement. That applies to both construction funding and operation of the finished project. If either option for the casino were built, the Chickasaw would be using that to establish their foothold in the California economy as the primary group running the casino complex.

But, if the third option were approved, there would be an instant push to expand the project to include a casino complex. The Chickasaw are not likely to be interested in creating living quarters for the Koi. They've invested in this project because of the casino. **SO, ALL THREE OPTIONS IN THE KOI PROPOSAL MUST BE REJECTED.**

Are there other examples of the deception of this project? Mr. Baltran has argued that local politicians were beginning to support his project. However, not one single currently serving politician, ranging from city council members to US Senators and Representatives, supports the project. He apparently found a former city council member who was willing to support him. So that's not exactly ringing support for his efforts! He also claimed that many Indian Tribes supported his project. But those were certainly not the dominant ones in Sonoma County. And those are the only ones that would be affected by the Koi casino complex.

As an honorary Native American I find Mr. Baltran's deceptive claims to be especially onerous.

I am also greatly troubled by the Environmental Impact Statement. The company that prepared the EIS claimed they had helped many Indian Tribes with their projects. However, they did a terrible job in identifying issues that the Koi casino project would face, and how they could be solved. Many of the issues were glossed over with mitigation strategies that couldn't possibly mitigate anything. The two that most troubled me were fire evacuation and water usage, but there are many others.

Fire evacuation, though, was the one that most troubled me. I know some residents had to wait two hours to leave the area during one of the recent evacuations. Since that time a new large apartment complex (130 units) has been added to the area and another is well along in its construction. If either of the two casino projects is approved, that will double or triple the number of people who need to evacuate in case of a potential fire. Adding a few turning lanes and even doubling the size of Shiloh Road can't possibly solve this problem; there would still be an impasse at both the Shiloh Road—Old Redwood Highway and Shiloh Road—US101 intersections. Airlifting some of the people from the casino couldn't evacuate more than a handful of those needing to leave quickly. A fire coming out of the Shiloh Ranch with a strong East wind would kill dozens, or even hundreds, of people.

THE ONLY MITIGATION STRATEGY THAT WOULD SOLVE THE FIRE EVACUATION PROBLEM IS TO NOT BUILD THE CASINO COMPLEX.

My second concern is with water. The casino complex will use a huge amount of water, which will come from the aquifers. Some of the Windsor water also comes from the aquifers. Windsor is a growing town, and the long-range plan talks about using more wells to produce the needed water. But aquifers can be depleted, as has been shown in several instances (most notably, perhaps, the Oglala Aquifer in the Midwest). Depletion means that existing wells need to be dug deeper. A number of homes in the area for which the casino is proposed operate with well water. If the casino complex drains water from the local aquifers, some of those wells will run dry. Can they just be dug deeper? Not forever, since the aquifers are not infinitely deep. Again, the mitigation strategy ignored the fact that the aquifers can be depleted to the point of becoming useless as sources of water for local residents.

I see no way the proposed casino project could prevent disasters in the two areas I discussed, as well as others that were whitewashed in the EIS. The entire Koi proposal has been fraught with deception since it was initiated, both from the leaders of the Koi, and from the EIS. **ALL THREE OPTIONS IN THE PROPOSAL MUST BE REJECTED.**

Yours sincerely,

Richard N. Boyd, Ph.D.
Grey Skyhawk

PACIFIC REGIONAL OFFICE

2024 DEC 16 PM 2:13

BUREAU OF INDIAN AFFAIRS

Richard N. Boyd
5846 Leona Court
Windsor, CA 95492
December 12, 2024

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

RE: FEIS Comments, Shiloh Resort and Casino Project

Dear Ms. Dutschke,

I am writing to voice my strong opposition to any of the proposed projects of the Koi in Sonoma County. My reasons are many, but I will focus on the ones I believe to be the most important. First, though, let me establish my credentials. I am an honorary Native American, which I was awarded because I helped orchestrate a solution between astronomers and Indians for a telescope on an Arizona mountain. I generally support the goals and wishes of Indian Tribes. But only when they don't attempt to violate existing traditions, legal mores, and basic logic.

The traditions require that a Tribe establish their casinos near their homeland. Sonoma County is not the Koi homeland. That is Lake County. The Koi are arguing that they should be allowed to build a casino in Sonoma County because they passed through this region in their travels. But that's a deception. Passing through does not establish them as living here.

Furthermore, I believe their entire proposal is based on deception. The Koi Tribe is extremely small, less than 100 members. They couldn't possibly operate a casino as large as they are proposing, or even direct building any of the three possible options they propose. And they couldn't possibly operate the casino complex that constitutes either of their first two proposals. It might be argued that they could direct construction of the third alternative, but if that were approved, is there any doubt that they would be back trying to expand their village into some form of the casino complex they really want?

I believe the answer to that is obvious. They have "partnered" with the Chickasaw, a large Tribe from Oklahoma with a complex of casinos. The Chickasaw certainly have the expertise to operate a large casino complex. However, their involvement in the Sonoma County project would make them the dominant partner. Indeed, the Koi become essentially irrelevant with the Chickasaw involvement. That applies to both construction funding and operation of the finished project. If either option for the casino were built, the Chickasaw would be using that to establish their foothold in the California economy as the primary group running the casino complex.

But, if the third option were approved, there would be an instant push to expand the project to include a casino complex. The Chickasaw are not likely to be interested in creating living quarters for the Koi. They've invested in this project because of the casino. **SO, ALL THREE OPTIONS IN THE KOI PROPOSAL MUST BE REJECTED.**

Are there other examples of the deception of this project? Mr. Baltran has argued that local politicians were beginning to support his project. However, not one single currently serving politician, ranging from city council members to US Senators and Representatives, supports the project. He apparently found a former city council member who was willing to support him. So that's not exactly ringing support for his efforts! He also claimed that many Indian Tribes supported his project. But those were certainly not the dominant ones in Sonoma County. And those are the only ones that would be affected by the Koi casino complex.

As an honorary Native American I find Mr. Baltran's deceptive claims to be especially onerous.

I am also greatly troubled by the Environmental Impact Statement. The company that prepared the EIS claimed they had helped many Indian Tribes with their projects. However, they did a terrible job in identifying issues that the Koi casino project would face, and how they could be solved. Many of the issues were glossed over with mitigation strategies that couldn't possibly mitigate anything. The two that most troubled me were fire evacuation and water usage, but there are many others.

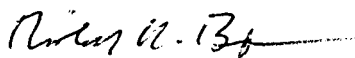
Fire evacuation, though, was the one that most troubled me. I know some residents had to wait two hours to leave the area during one of the recent evacuations. Since that time a new large apartment complex (130 units) has been added to the area and another is well along in its construction. If either of the two casino projects is approved, that will double or triple the number of people who need to evacuate in case of a potential fire. Adding a few turning lanes and even doubling the size of Shiloh Road can't possibly solve this problem; there would still be an impasse at both the Shiloh Road—Old Redwood Highway and Shiloh Road—US101 intersections. Airlifting some of the people from the casino couldn't evacuate more than a handful of those needing to leave quickly. A fire coming out of the Shiloh Ranch with a strong East wind would kill dozens, or even hundreds, of people.

THE ONLY MITIGATION STRATEGY THAT WOULD SOLVE THE FIRE EVACUATION PROBLEM IS TO NOT BUILD THE CASINO COMPLEX.

My second concern is with water. The casino complex will use a huge amount of water, which will come from the aquifers. Some of the Windsor water also comes from the aquifers. Windsor is a growing town, and the long-range plan talks about using more wells to produce the needed water. But aquifers can be depleted, as has been shown in several instances (most notably, perhaps, the Oglala Aquifer in the Midwest). Depletion means that existing wells need to be dug deeper. A number of homes in the area for which the casino is proposed operate with well water. If the casino complex drains water from the local aquifers, some of those wells will run dry. Can they just be dug deeper? Not forever, since the aquifers are not infinitely deep. Again, the mitigation strategy ignored the fact that the aquifers can be depleted to the point of becoming useless as sources of water for local residents.

I see no way the proposed casino project could prevent disasters in the two areas I discussed, as well as others that were whitewashed in the EIS. The entire Koi proposal has been fraught with deception since it was initiated, both from the leaders of the Koi, and from the EIS. **ALL THREE OPTIONS IN THE PROPOSAL MUST BE REJECTED.**

Yours sincerely,



Richard N. Boyd, Ph.D.
Grey Skyhawk

November 24, 2024

Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs Pacific Region
2800 Cottage Way, Sacramento, CA 95825

PACIFIC REGIONAL OFFICE
2024 DEC -2 PM 1:59
BUREAU OF INDIAN AFFAIRS

Bonnie Farrow
5820 Mathilde Dr.
Windsor, CA 95492

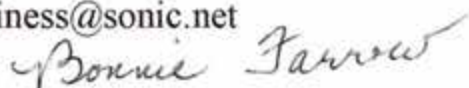
Dear Chad,

I wrote to you before stating that I was concerned about the noise, lights on 24-7, and the air quality if a Casino was crammed into the space just across the street from my house. I am only 5 houses away from the land that you want to develop.

I am also very concerned about fire and getting out to HWY 101 to evacuate.

I thought that a casino needed to be far away from a residential neighborhood. I am voting "NO" on this project that you are proposing.

Bonnie Farrow
bonnie-business@sonic.net



To: Amy Dutschke
Regional Director
Indian Affairs, Pacific Region

PACIFIC REGIONAL OFFICE
2024 DEC -2 PM 2:00

BUREAU OF INDIAN AFFAIRS

11/25/2024

Re: FEIS Comments, Shiloh Resort Casino Project


Let me first state that while I live in Santa Rosa, Ca, I do not live adjacent to or near the proposed Casino project. In addition I don't have any particular problem with Casinos in general, Indian owned or private investor. I, in fact, have been to several casinos in Northern California including, but not limited to, Graton, Cache Creek, and Wind River. My problem is the location of the proposed casino. I can hardly think of a worse site for a Casino. With the exception of the vineyard, which are many in Sonoma County, this particular site is adjacent to numerous residential communities.

The east side of Hwy 101 north of river road is primarily residential with elementary schools and small local businesses. The west side of 101 is home to many industrial parks, including the train station and local airport; which in my humble opinion are more suitable to a large casino.

Whatever one might think about the size of the Graton Casino, it is arguable suited to its surroundings. To wit it is primarily in an industrial part of town and adjacent to some open farm land. Very little to no residential housing the area. Cache Creek on the other hand is out in the middle of farm land and open hills. Both are reasonably well suited to their surroundings. I would support another casino adjacent to Graton... much like casinos in South Lake Tahoe, Reno, Las Vegas etc. It gives patrons choice... they frequently avail themselves of visiting multiple casinos in one day without having to drive around.

In Summary, I would say the the Shiloh Rd location is not just a bad site, it is a **galactically bad site.**

Regards, Dennis Cain
2521 Steeplechase Ct.
Santa Rosa, Ca. 95401
(530) 277-1102



PACIFIC REGIONAL OFFICE

2024 DEC -2 PM 1:58

From: Stephen Kent, 534 Sunnyvale Drive, Healdsburg, CA
FEIS Comments, Shiloh Resort and Casino Project

BUREAU OF INDIAN AFFAIRS

My daughter, son-in-law and grandson live in Windsor, CA about 2.5 miles from the proposed site and my wife and I live 15 minutes North of the site. We do not believe that the Koi Nation Casino Project should be approved for the following reasons:

1. Its location adjacent to the Wildland Urban Interface and the potential number of visitors (5100 parking spaces!) there makes evacuation from South-Eastern Windsor dangerous. Small roads in that area lead to highway 101. Congestion around the on and off ramps at 101 and Shiloh Road is already significant.
2. There are already 2 large casinos in Sonoma County (Graton Resort and Casino, 15 miles South of the proposed site, and River Rock Casino in Geyserville, 17 miles North of the proposed site). There is no need for a 3rd Casino between these 2 existing Casinos.
3. Casinos are inherently regressive for many of the visitors who waste their money gambling. Casinos use scarce resources, and they create a large increase in everyday traffic.
4. Water is a major problem in CA. During our most recent drought that ended 2 years ago, the 2 reservoirs that feed the Russian River were at extremely low levels. Sonoma County cities and towns had many restrictions in place. Many families bought recycled water to keep our vegetable and fruit tree gardens alive without using potable water. It is only a matter of time until we have an even more severe drought.
5. Shiloh Ranch Regional Park is a wonderful area for hiking, birding, running, picnicking, and biking. Parking is limited and the potential increase in visitors could impact the health of the park. It would add to the risk of forest fires from careless smokers or bad actors.
6. Finally, the scale of the project relative to the size of the Koi Nation (less than 100 members) is ridiculous. A relatively small hotel, without a casino, would be a more appropriate scale for a Nation of this size. The impacts created from the construction and use of this very large facility is unacceptable in a rural area that already has 2 casino resorts.

Thank you for listening.

Concerned Citizens

PACIFIC REGIONAL OFFICE

Amy Dutschke 2024 DEC -2 PM 2:36
2800 Cottage Way
Sacramento, CA 95825
BUREAU OF INDIAN AFFAIRS

Dear Ms.Dutschke,

All the while, the Koi nations along with the Chickasaw Natives of Oklahoma has previously tried to get land under trust to open a Casino in Solano and Alameda Counties, so is this not, obvious, " Casino Shopping at its best". This is problematic, it is clear to me that the department of the Interior affairs is ignoring tribal, local, state and federal affairs. Is the year 2025 the point of no return for indigenous people? If you allow tribes to start a cycle of your land is now "bought" to be our land for a Casino. We are repeating the actions of history and white mans greed. It is only the true Native American Indian who can stop this plague. We take pride in our history and don't lie about our ancestors , where they lived and the land they worked. These true Native Nations , communities, families, already are fully established and have our hearts and memories firmly established where our ancestral people lived and now we can show our respect and honor to the very land they roamed and in turn we can now serve to protect their history and not let it be exploited by peoples who have not cared for nor have lived on this land. Is it the goal of the Bureau of Indian Affairs to be coming together for the benefit of non-native Americans, politics and money! Please let me be wrong , and stop the KOI nation from imposing on a land that was not in their heritage or in accordance with the regulations already as stated.

Sincerely,



Julie Edwards
3148 North Canyon Rd
Camino Ca 95709

"FEIS Comments, Shiloh Resort and Casino Project"

PACIFIC REGIONAL OFFICE

August 8, 2024

Nov 29, 2024

2024 DEC -2 PM 2: 37

Amy Dutschke, Regional Director BUREAU OF INDIAN AFFAIRS
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

Subject: EIS Comments (Koi Nation) Shiloh Resort and Casino Project

Dear Regional Director Dutschke:

79 yrs old

I am a Sonoma County resident and I oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project. The draft environmental impact statement (DEIS) released ~~October 3, 2024~~, 2024, contains complex, technical information and is virtually impossible for a layperson to understand or comment on.

* **Moreover, it does not adequately address the significant impacts this project will have on the surrounding community and Sonoma County if it is approved.**

Sonoma County and the Town of Windsor have raised numerous concerns related to water supply, wastewater, traffic, wildfire risk and evacuation routes, law enforcement and public safety, and housing and other economic impacts. Sonoma County Tribes have also highlighted the impacts on them and their cultural resources. Many of the mitigation measures in the DEIS are framed as best management practices, but there is *no guarantee that they will occur.*

* I am very concerned that the Bureau of Indians Affairs ~~is rushing this process~~ has not adequately considered the local environmental impacts, and **cannot guarantee or enforce the mitigation that is proposed.**

We support the local, indigenous tribes. This project is not right for Sonoma County and will do nothing to restore lands to the Koi Nation, whose homeland is in Lake County. The only way to avoid significant environmental impacts is for the Bureau of Indian Affairs to **approve the environmentally preferred "no project" alternative in the DEIS.**

Sincerely,

Maria Singh

[Your Name]

[Your Address]

630 Colonial Park Dr
Santa Rosa CA 95403



literally 3/10m. across the road. Please do not vote to endanger all living beings here. Thank you

December 2, 2024

PACIFIC REGIONAL OFFICE

2024 DEC -4 AM 11:32

FEIS Comments, Shiloh Resort and Casino Project

Amy Dutschke

Regional Director, Bureau of Indian Affairs, Pacific Region

2800 Cottage Way

Sacramento, California 95825

My name is Lauren Sloan. I live in unincorporated Santa Rosa CA, 2 miles from the Koi Resort Casino Project currently up for approval. (AKA Shiloh Resort and Casino Project)

I understand this is the last public comment opportunity prior to the decision to move forward on the project.

I am adamantly opposed to the Koi casino project as it would impact the community in so many negative ways; traffic, noise, pollution, overuse of water and other local resources, potential increase in crime, wildfire risk corridor, to name a few. There is nothing positive about it for the community!!! It is shocking that anyone would think of putting a casino in the middle of a pristine green space adjacent to a longtime family neighborhood, a city park, and county park. It is horrific for the families of Windsor impacted by this grotesque massive resort /casino.

Please pass on my concerns. Thank you for your attention.

Lauren Sloan
5025 Deerwood Drive
Santa Rosa, CA



December 3, 2024

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

PACIFIC REGIONAL OFFICE
2024 DEC 10 AM 10:46
BUREAU OF INDIAN AFFAIRS

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

To Regional Director Dutschke:

I am a Sonoma County resident living in Windsor, and I VEHEMENTLY oppose the Koi Nation's casino/spa/hotel and enormous parking structure for over 5000 cars that they want to construct which is a local NEIGHBORHOOD with a park directly across the street along with many homes and a church. I tried to understand the Final Environmental Impact Statement (FEIS) and the earlier draft environmental impact statement (DEIS), but I found it difficult to understand. BUT – I found that it continues to fail to adequately address the impact this project will have on our entire community and Sonoma County. PARTICULARLY discussing the aspects of fire and also drought.

I have written SO MANY letters and emails and attended the meetings and phone calls but I am SO frustrated. The Bureau of Indian Affairs (BIA) is NOT listening to the concerns of our community and the concerns of other tribes who already live here and have casinos. I honestly cannot believe we are at this point and that this KOI PLOY hasn't been scuttled. Maybe it's the big \$\$ sunk in by the Chickasaw nation who could care less about our community and the ACTUAL TRIBES who are from our county and are also against this casino being built where the KOI HAVE NO ROOTS and no HERITAGE to this land or community.

Massive opposition exists at every level—from the state down to individual neighborhoods. Sonoma County and the Town of Windsor have raised critical concerns regarding water supply, wastewater management, traffic congestion, wildfire risk, and evacuation routes, law enforcement and public safety, housing, and broader economic impacts. Local indigenous tribes have also highlighted the profound and harmful effects this project will have on their cultural resources. Despite these serious concerns, the BIA has failed to address them adequately, and many mitigation measures outlined in the FEIS are vague, framed merely as "best management practices" without any enforceable guarantees. I have seen them address the fires with having people help to clear the parking lots. It's a joke – clearly none of these people have ever experienced fires as we have. We have had to evacuate twice in recent years. My own home in Windsor was damaged and I was out of my home for months. When we evacuated there was SO much traffic to get out. I cannot imagine another 5000 plus cars trying to get to our ONE highway. I have said in numerous other letters I have sent – just like LAHAINA – if we are sitting in our cars and we can't get out and we burn up – I hope my family sues the hell out of the BIA because we are warning you now. This is a BAD idea. This is a high fire risk area. State Farm insurance has recently cancelled almost all policies in Windsor. There is a reason. And now you want to put thousands more people here to clog up our roads, use our water and take away business from other native tribes casinos – 2 within 15 minutes north and south of

Windsor. This is just pathetic that this has gone on and on and on. All in the name of greed and money for a tribe who has NO ROOTS here. They are NOT a Sonoma County tribe. This would set an entirely new precedent – and not a good one at that.

You have promised to consider public comments, but it is evident in the FEIS that you have not. The current process feels rushed and dismissive of the voices of those who will be directly affected. The 30-day comment period is particularly outrageous, given that it falls during the busy holiday season, effectively limiting meaningful public participation. I am so busy and have been traveling and it's been hard to find time to even put a letter together. We demand an extension of this period to allow the community sufficient time to respond thoroughly. I have not met ONE person who wants this casino. We have VERY low unemployment. It is very expensive to live here. Businesses are struggling to find workers and now you want to add another large business here in the middle of our neighborhood? Makes no sense to me.

For many years we have suffered a drought here in our county. For years my family and I took 3-4 minute showers. I took out all my plants and grass. Now this non-native tribe can come into our neighborhood and take our water – where people will be taking long showers and using the spa for showers and pools etc and taking baths (I haven't had a bath in years due to our drought)– and clearly you have NO idea how bad our water situation has been for years and years. This just kills me because people don't know how much we all understand our resources are limited and now we will have 5000 people using towels and bathrooms and showers. How can you not care about our very real concern for fire and water in this county??? We tell you over and over and it falls on deaf ears.

THIS PROJECT is in an actual neighborhood. It is a beautiful area. Lots of nature and wildlife. I ride horses across the street up and into Shiloh park. This will completely turn this lovely area and neighborhood into a dangerous area where there will be drunk drivers, people committing crimes – who knows what. Because let's just be frank – casinos don't attract the best of us. My heart aches for the people who live right there. It was very bucolic and now this.....and NO ONE from BIA is listening to all of the reasons this is the wrong place for this casino.

While we support local indigenous tribes, this project is not suitable for Sonoma County and does nothing to restore lands to the Koi Nation, whose ancestral homeland lies more than 50 miles away in Lake County. The only way to prevent the severe environmental, social, and cultural harm this project poses is for the BIA to approve the environmentally preferred "no project" alternative in the FEIS.

Sincerely,



CARRIE MARVIN
237 LA QUINTA DRIVE
WINDSOR CA

FEIS COMMENT, SHILOH RESORT
AND CASINO PROJECT
ATTN: CHAD BOUSSARD
Concerning Potentially Proposed Koi Casino

December 4, 2024
Windsor, Calif.

1130

I am in my 80's and have lived in Oak Park (mostly retired people) for 5 years which is the sub division directly across Shiloh Rd from proposed Koi Casino, Hotel resort.

I was burned out from my home by the Tubbs Fire in 2017 which was a nightmare for me. Eventually I found my Sanctuary here in Oak Park.

I understand from Wild Fire Experts that Shiloh area is vulnerable to potential Wild fire. A huge Casino Hotel would impact evacuation efforts in a devastating way.

I beg you, please disallow the Koi Casino to be built in our residential area, it's not a good move for anyone.

A huge population fighting to exit Shiloh Rd would be morally wrong.

Please do not let this Casino
be built!!!

Sincerely,
Mary Ann Sorensen
237 Chris St.
Windsor, Calif. 95492

PACIFIC REGIONAL OFFICE

2024 DEC 10 AM 10:52

BUREAU OF INDIAN AFFAIRS

ANNETTE FLACHMAN

9557 Kristine Way

Windsor, CA 95492

Dec. 5, 2024

Amy Dutschke
Regional Director, BIA, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Re: FEIS Comments, Shiloh Resort and Casino Project

Dear Ms Dutschke:

I am writing to urge you to reject the Koi Nation resort casino in Windsor, CA. Aside from the fact that this is a poor location, in a residential neighborhood that will reduce the value of homes in the area resulting in destroying families' equity in their homes, this is not anywhere near the Koi Nation's native lands. When we voted to allow Indian casinos on sovereign land in CA, we were not informed that any tribe could buy up large portions of land, call it their homeland and plant a casino wherever they wanted. We already have two casinos in Sonoma County and the tribes who own those casinos are also opposed to approval of this site. I don't pretend to know the legal criteria for tribes to claim land as their homeland, but the Koi Nation has tribal land in Lake County, not Sonoma County and should not be allowed to claim whatever site they want as their tribal land.

This is near a residential area with children, parks, schools and family homes. This is a quiet community, very family oriented, fairly rural and a terrible site for a casino. It would change the entire character of our town. Additionally, CA has been in a severe drought for a number of years, and while we've had significant rain in the past two winters, drought conditions will return and become worse as climate change becomes worse and increasing water usage by expected casino patrons will make conditions much worse for those of us who live here, probably resulting in water rationing.

Add to that, we had wildfires for five years in a row which resulted in extreme loss of homes and lives. In this area we have mostly rural two lane roads in poor repair and there is no infrastructure for more traffic to be evacuated in case of emergency. We already have gridlock on the freeway during commute hours. Adding expected casino traffic will be a nightmare for current residents. During the Kincadee fire in 2019, when we were evacuated from Windsor, it took me over an hour to get from Windsor to Santa Rosa, a distance of about 7 miles, on three lanes of freeway heading south; just me and my cat in the car, choking on the smoke, buffeted by the winds and having difficulty seeing because the smoke was so thick, not knowing if I had a home to return to. It was terrifying. If we had had additional traffic attempting to flee the Kincadee fire, there's a good chance people would have burned to death in their cars just because of traffic gridlock. I can't think of a worse way to go. Adding more people will only make things worse. This is the wrong location for the wrong type of business. The people who live, work and own businesses and homes here should be able to reject this type of addition to our area.

Annette Flachman



December 6, 2024

PACIFIC REGIONAL OFFICE

Amy Dutschke, Regional Director,
Bureau of Indian Affairs, Pacific Region

2024 DEC 10 AM 10:18

2800 Cottage Way, Sacramento, California 95825 BUREAU OF INDIAN AFFAIRS

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

Dear Regional Director Dutschke:

I am a Town of Windsor resident, and I strongly oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land at Shiloh and Old Redwood Highway in the Town of Windsor for a hotel and casino gaming project. My wife and I recently purchased a new home on Shiloh and Hembree Lane and we are quite concerned that a casino of this size and magnitude so close to our neighborhood is not in the best interest of the Sonoma County, Town of Windsor, or our neighborhood.

The Bureau of Indian Affairs (BIA) is not listening to the concerns of the community. Massive opposition exists at every level—from the state down to individual neighborhoods. Sonoma County and the Town of Windsor have raised critical concerns regarding water supply, wastewater management, traffic congestion, wildfire risk, and evacuation routes, law enforcement and public safety, housing, and broader economic impacts. An example of the inability of the infrastructure to adequately handle this much additional burden took place on November 14, 2024. On that day, much of the area was inundated with rain to the point that the northbound Shiloh off-ramp was closed due to flooding. With additional traffic created by the casino, access to our neighborhood would have been nearly impossible. The additional use of the area's roads would have made things even less safe in this kind of situation.

Local indigenous tribes have also highlighted the profound and harmful effects this project will have on their cultural resources. Despite these serious concerns, the BIA has failed to address them adequately, and many mitigation measures outlined in the FEIS are vague, framed merely as "best management practices" without any enforceable guarantees.

While I support local indigenous tribes, this project is not suitable for Sonoma County and does nothing to restore lands to the Koi Nation, whose ancestral homeland lies more than 50 miles away in Lake County. The only way to prevent the severe environmental, safety, social, and cultural harm this project poses is for the BIA to approve the environmentally preferred "no project" alternative in the FEIS.

Sincerely,



Bill Comings
1102 Portello Ln
Windsor, CA 95492

8 December, 2024
Chad Broussard
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, California 95825

PACIFIC REGIONAL OFFICE

2024 DEC 11 PM 12:12

BUREAU OF INDIAN AFFAIRS

Dear Mr Broussard,

I am writing in regards to the proposed Koi Nation casino project in Windsor; and how it would impact our community here in the town of Windsor, the surrounding communities in Larkfield-Wikiup and the Indigenous community from Sonoma county.

First, I believe this project would highly affect the town of Windsor and Larkfield-Wikiup area, being that it would be near Old Redwood Hwy, a major artery for traffic to many of the neighborhoods. In case of an emergency and people have to evacuate, there would be more gridlock traffic as we experienced during the 2017 wildfires. With my own experience having to flee from the Tubbs fire, with my only route being Old Redwood Hwy right down the street from the proposed casino location, I barely escaped the fire area having to navigate through smoky air and traffic. I am concerned with evacuation routes in the event of another wildfire emergency as the shiloh, and larkfield area is in a high fire risk zone. A casino put in the middle of these neighborhoods would bring more concern about emergency planning. The Shiloh road exit, which leads to neighborhoods to the east and west of it, already sees an abundance of traffic as there are more small communities being built with only two other routes out. This makes no sense to put a large casino in this small intersection.

Secondly, my concern is for the many parks nearby this proposed casino and the environmental harm it will cause. Local and regional parks would be affected by this casino due to the crime and possible litter. Right across the street from this land is a park with a sports field, it's a family gathering area, and a place for children to play. It is odd for a casino to be placed right next door as it will bring crime and loitering to the nearby parks. On another corner across from the proposed site, is a regional park. The beauty and natural ecosystem is what makes Sonoma county parks unique. With the large construction and traffic, it would disrupt the surrounding environment where many of the endangered species in our county would be harmed. With many creeks and waterways in our area, I worry about trash left behind from visitors to the casino that could possibly end up in our parks nearby.

Lastly, as an Indigenous person to Sonoma County, the land where my ancestors are from and lived for many years, it saddens me that our community and many other local indigenous communities are being disregarded to our concern about another tribe whose roots are not from

sonoma county bringing a casino so close to our ancestral lands; Land that our local tribes have fought for many years to return to.

Many local elected officials, the Governor of California, the Sonoma county board of supervisors, Senator Mark Mcguire, Congressman Jared Huffman, The Windsor town council, My Neighbors in Windsor and Larkfield, and My fellow indigenous communities oppose this Casino project. I ask you to take our concerns into consideration.

Sincerely,

Kendra Gonzalez



Chris Thuestad
6186 Lockwood Dr.
Windsor, CA 95492

PACIFIC REGIONAL OFFICE

2024 DEC 10 AM 10:46

BUREAU OF INDIAN AFFAIRS

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W—2820
Sacramento, CA 95825

Re: EIS Comments, Koi Nation Shiloh Resort and Casino

The Koi Nation bought a 68-acre property near Windsor, in Sonoma County, CA and announced its intentions to open a new casino there. I am deeply concerned about this for a number of reasons and feel very strongly that this should not be allowed to happen.

I've written several letters in protest of this project. I'm gratified that even the Governor of California, Gavin Newsom, has voiced his opinion that the project should not be allowed. In his letter, written by Bryan Newland, he pointed out that according to federal law, any proposed casino must "not be detrimental to the surrounding community". This casino would be nothing but detrimental to the surrounding community!! A casino brings traffic, noise, and crime. It is immediately adjacent to neighborhoods and a church. I read somewhere that the Koi Nation proposes to pay for the neighbors to have thicker, noise-reducing windows put in their houses. What about their backyards? Are they expected to give up the peace and serenity they have now? The property values of everyone in the area will drop significantly. We've been in our home for almost 40 years. If we have to move, I can't imagine what sort of a loss we'd take on our property – probably hundreds of thousands of dollars. And then, the property taxes for a new place would probably cost at least \$1,000 a month more compared to what we pay now. We're retired; this home is our nest egg, and we're only half a mile from the proposed site. We are only one couple – multiply that by thousands of families in the area. This casino would be disastrous for all of us!

When the Graton Casino in Rohnert Park opened for business, it cannibalized 50 – 70% of the River Rock Casino's business in Geyserville according to the Press Democrat. The Koi Nation is a Lake County tribe with roots 50 miles away yet they bought land in Sonoma County just about half way between two existing casinos owned by Sonoma County tribes –

and I don't think that was a coincidence. They plan to take business away from these Sonoma County casinos. There are also two other local tribes in the area that have expressed an interest in building casinos. The Koi Nation may have the right to build a casino in California, but it needs to happen on their own ancestral land in Lake County. It isn't fair to the local tribes to have to compete with them. As noted in Newsom's letter, the law states, "the restored lands exception must not be construed so broadly as to 'give restored tribes an open-ended license to game on newly acquired lands' and 'in administering the restored lands exception, the Secretary needs to ensure that tribes do not take advantage of the exception to expand gaming operations unduly and to the detriment of other tribes' gaming operations." It's almost as if this section of the Federal Law was written specifically to keep the Koi Nation from being allowed to build a casino on this site.

The proposed site is in a high fire danger area that has been forced to evacuate for wildfires or been put on alert for possible evacuation several times in the last several years. When we had to evacuate during the Kincadee fire in 2019, my husband was at Home Depot on Shiloh -- it took him almost an hour to get back to our house which is just a mile away. According to MapQuest, it should only take 4 minutes! Adding a casino to the area with around 2,000 employees and an untold number of guests is insane. When the next wildfire goes through, people could die in their cars like the tragedy that happened in Paradise, CA. And yes, the roads could be improved, but the only way for this to happen at this site would be to bulldoze several existing homes in order to widen the road. Even then I'm not sure there would be room.

I'm also concerned about water usage. In addition to a gaming area, the proposal includes six restaurants, a spa, and a 400-room hotel. We don't have enough water for the people who are already here let alone for all these extra people. The scientific community has warned that our droughts will increase in frequency and duration. During the recent multi-year drought, we were headed to a real disaster until the rains finally came. The casino proposal shows plans to put in a 700' well and pump out a quarter of a million gallons of water a day. Not only will all the existing wells in the

area go dry in the next drought (or before), there could be problems with ground subsidence leading to property damage. Once the land is taken into trust and the casino is built, there won't be anything anyone can do about that. We've already been told to replace our toilets, dish washers, and washing machines. We've been asked to pull up all our water-intensive landscaping. We've been required to only water our lawns on certain days each week, not to wash our cars in the driveway, and to cut our usage by as much as 20%. What's next? No showering? No yards at all? No drinking water?

No one wants to live by a casino! Everyone who lives in Windsor will be impacted by the increase in traffic, noise, and crime, and many will see a sizable reduction in their property values. We already don't have sufficient water or adequate roads. The Graton and River Rock casinos will see a significant reduction in their profits taken by a tribe from another county. Please, please do not allow the Koi Nation to build this casino in Sonoma County!!

Respectfully,



Chris Thuestad
6186 Lockwood Drive
Windsor, CA 95492

Koi Casino Project Concerns

Sat 12/14/2024 11:31 AM

From: Richard Addison

To: admin@shilohresortenvironmental.com, chad.broussard@bia.gov

Cc: "Richard B. Addison", ICE



Dear Mr. Broussard and BIA:

My wife, children and myself live in the Wikiup/Larkfield neighborhood which, though adjacent to the Koi Nation's proposed casino development project, was not even mentioned in the DEIS report. While we support local indigenous tribes, this project is not right for Sonoma County and will not do anything to restore ancestral lands to the Koi Nation. We are opposed to this project for a variety of reasons including, but limited to, the significant environmental impacts it will have on our area. The only way to avoid these significant and dangerous impacts is for the Bureau of Indian Affairs to approve the environmentally preferred "no project" alternative D in the DEIS.

Having lived through the Tubbs Fire and subsequent evacuations, we are acutely aware of the dangers of evacuation in emergency situations. It took us 45 minutes to get down our hill in Wikiup during the Tubbs Fire - a trip that usually takes about 3 minutes. The increase in cars and traffic from the proposed casino and/or hotel will make it impossible for residents to safely evacuate their homes in an emergency situation. There will be gridlock far worse than there was on the night of the Tubbs Fire. We are concerned that if the project is approved in any form, people will be at much greater risk during the next fire.

We are also concerned about the water supply which is precarious in the best of times and the drilling of new wells will have a negative impact on the existing water supply. We are concerned about the effect of such a large project on climate change, greenhouse gas emissions, stress on the electric grid, and the increase in pollution of many different kinds: noise, light, and heat.

This agricultural land is available because voters set the Windsor border next to it as a community separator. It is in the urban Growth Boundary of Windsor. This was a choice of the voters to keep the area from becoming built up, to keep open spaces, to maintain the views from Shiloh Park. The DEIS does not seem to take into consideration the number of hotels that are already approved for Sonoma County.

This project is not in the spirit of restoring lands to a tribe that is not local; rather it would stretch the "restored lands" exception beyond its legal limits.

For all these reasons, we strongly urge the approval of a "no project: alternative D" in the DEIS.

Sincerely,

Margaret and Richard Addison
5386 Vista Grande Drive
Santa Rosa, CA 95403

From: susan yavorsky <susanay@icloud.com>
Sent: Thursday, December 12, 2024 7:00 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am a resident of Healdsburg, CA, 7 miles North of the proposed Koi Casino.

Recently in a rainstorm, a great deal of rain water pooled in the area designated for its construction.

Likely, the developer would mound up dirt, and raise the level of the land to avoid flooding. This results in flooding of the adjoining properties instead, which end up being on lower ground.

Please do not allow this to happen to our community.

Thank you,

Susan Yavorsky

Sent from my iPhone

From: Karen Tarter <tarter.ks@gmail.com>
Sent: Thursday, December 12, 2024 4:45 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] No Casino in Windsor!

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Mr. Broussard,

I am a homeowner in Windsor, California, and I urge you to oppose the proposed Koi Nation casino project.

When I purchased a home in Windsor, I was impressed by the family-friendly atmosphere, the low traffic, the low crime rate, and the quality of people living here. I love to take my children and grandchildren to parks, restaurants and businesses in the area. Allowing a casino to be built here would, in my opinion, ruin all of that.

I urge you to PLEASE oppose the proposed Koi Nation casino in Windsor.

Thank you,
Karen Tarter

From: George Antenucci <geoda48@gmail.com>
Sent: Thursday, December 12, 2024 12:08 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, 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'm a resident of Windsor, California. Our home is approximately a mile from the site of the proposed Casino and Resort named in the subject line of this email. If this project were to be approved it would dramatically and negatively affect the quality of life for my family and based on conversations with others in our community, many other families as well.

Many of us moved here (or stayed here) to escape the congestion, pollution, noise and crowding of cities and/or over-developed communities. We don't want or need another casino. There are three within a 30 minute drive from the proposed site and one of those is a 10 to 15 minute drive..

The development of this casino is opposed not just by individuals like me but the State, County, City and Town governments.. I have yet to hear from anyone (outside of the developers and a Tribe that has very little if any connection to this site) that this huge casino and resort is a good idea..

I would strongly suggest that this development is not approved - listen to all the stakeholders - not just those who will profit financially from the project

.
--

GeorgeAntenucci
1331 Birdie Drive
Windsor, CA 95492

From: Eddie Flayer <eddie.flayer@att.net>
Sent: Friday, December 13, 2024 8:06 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello Mr Broussard

Sonoma County doesn't need a third casino and this one would be in the worst location I could imagine. That area of Windsor would be destroyed in so many ways. The small town charm with vineyards would be decimated. There are 2 large apartment complexes near that area and a large sports field. There is not enough parking in that area now. Old Redwood Hwy is very narrow and there are lots of bicyclists that travel that road. It would become more dangerous. Bring up a google map of the area and you will see what I'm talking about. This area of Sonoma County is known for its small town charm, wineries and vineyards. There are lots of small subdivisions in the area that would be harmed in so many ways. If you lived in the area what would be your thoughts? The town of Windsor would no longer have a small town charm.

Thank you for taking my thoughts into consideration,
Eddie Flayer

From: MARY HESS <mtnmusic@att.net>
Sent: Friday, December 13, 2024 8:51 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Opposition to proposed Koi casino near Windsor

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Chad,

I have written before with my concerns about the casino proposed for the fields between Larkfield and Shiloh.

I am opposed for many reasons for the casino complex to be built right there pushing its way into residential neighborhoods, and surrounded by churches and schools. It's an inappropriate location for such a massive project.

This project will bring a huge increase in traffic, noise, and light pollution and airborne pollution to an area that is valued as green space between Larkfield and Windsor. We love our night birds, deer and foxes, but these will move away in face of yet more human impact. The local regional park in the hills will look down upon this project and weep.

It would be built in a high-risk fire zone which has already been threatened twice by wildfire. There will a significant draw on groundwater which is an ongoing concern for this area. There is undeniable crime that accompanies such enterprises: drunk driving, thievery, and prostitution.

More impermeable, climate-changing concrete and paving will increase emissions and cause local flooding.

The Koi nation needs to scoot away to a more likely place in Lake County like on the east side of Clearlake. That is where they will thrive.

Please reconsider and find a more suitable location for this casino. Thank you.

Sincerely,
Mary T Hess

From: Sidnee Cox <sidnee@sonic.net>
Sent: Friday, December 13, 2024 11:08 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Re: FEIS Comments- 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: Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs**

December 13, 2024

Re: FEIS Comments, Shiloh Resort and Casino Project

Dear Mr. Broussard,

Thank you for receiving comments regarding the Environmental Impact Statement for the proposed Koi Nation Resort and Casino Project on Shiloh Road, adjacent to Windsor, CA. There are a large number of environmental impacts that need to be considered regarding the placement of this proposed casino, many that cannot be mitigated. I ask that you deny the project for these reasons.

First of all, after Windsor was incorporated in 1992, a community separator and Urban Growth Boundary was established to provide critical open space directly south of town (now the location of the proposed casino project). This open space proved to be a vital firebreak during the Kincade fire in 2019 that threatened to destroy most of Windsor. The flames came within half a mile of our neighborhood on East Shiloh. (See video links below.)

In addition, much of the east side of Shiloh Regional Park burned in the 2017 Tubbs Fire. Only a change of wind stopped the fire from racing down into our neighborhoods on East Shiloh. That was the night when over 5,000 homes were destroyed as the fire moved just a few miles south.

Secondly, 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.

The evacuation issue has now become even more of a concern due to the new 134 unit housing complex on the corner of Shiloh and Old Redwood that will soon be filled with families. This is in addition to another 173 unit apartment complex under construction just down the road. These apartments reflect California's affordable housing mandates. With this density of neighborhood housing, adding a casino complex of any size on East Shiloh could spell disaster.

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. The view behind the news commentator is the location of the proposed Koi Resort and Casino. <https://newsofthenorthbay.com/live-cal-fire-command-center-at-shiloh-regional-park-in-windsor/>

Third, the impact of intensive development in this protected area, which includes 850 acres of Shiloh Regional Park, would greatly endanger its ecosystem. The park is home to many species of birds and wildlife. Please review the impact that vehicle pollution, groundwater pollution/ depletion, light pollution, noise pollution and toxic emissions would have on Shiloh Park and the surrounding area.

Although the new apartments will be impacting *evacuation routes* for the proposed casino as well as the surrounding neighborhoods, the apartments were required to satisfy the CA housing crisis, as mentioned. However, unlike the proposed casino, these apartment complexes encourage *reduced* daily vehicle usage and will also be using municipal Windsor water and sewer so will not be depleting local wells that many of our neighbors depend on. The new apartments will have little impact on noise and light pollution at Shiloh Park and neighborhoods along East Shiloh due to the fact that they are farther away and are *residential dwellings* and not 24/7 public gaming facilities.

Please see the maps below that show the location of the two nearest casinos in Sonoma County: Graton Resort and Casino in Rohnert Park and River Rock Casino in Geyserville. Neither of these casinos is in the midst of residential neighborhoods.

Finally, as you probably know, the Koi Casino project is opposed by Governor Newsom, Sonoma County Board of Supervisors, Windsor Town Council, U.S. Senator Alex Padilla, Representatives Jared Huffman and Mike Thompson, CA Sen. Majority Leader Mike McGuire, and local tribes.

Thank you for your time and consideration.

Sincerely,
Sidnee Cox
5846 Leona Ct.,
Windsor, CA 95492



Graton Resort and Casino
Rohnert Park



River Rock Casino, Geyserville



Proposed Koi Casino and
Resort Complex just outside
Windsor's southern boundary.

Above left, Graton Casino, Rohnert Park, is in an industrial and business zone. Above, River Rock Casino, Geyserville, is in a rural area, distant from any developments.

Below, left, the proposed Koi Casino will be located at Windsor's southern boundary. It will be adjacent to residential neighborhoods. The two new apartment complexes impacting evacuation routes are shown in orange.

The proposed Koi project alternatives A, B and C will have significant environmental impact on water resources, traffic, air quality, public services, evacuation planning in emergencies, and more. The most recent EIS does not reduce these impacts to "less than significant."

2024 DEC 18 AM 11:54

Dedicated to Protecting the Unique Beauty and Ecology of Sonoma County

BUREAU OF INDIAN AFFAIRS

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

December 13, 2024

Re: FEIS Comments, Shiloh Resort and Casino Project

Dear Director Amy Dutschke,

Thank you for receiving comments regarding the Environmental Impact Statement for the proposed Koi Nation Resort and Casino Project on Shiloh Road, adjacent to Windsor, CA. There are a large number of environmental impacts that need to be considered regarding the placement of this proposed casino, many that cannot be mitigated. I ask that you deny the project for these reasons.

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Finally, as you probably know, the Koi Casino project is opposed by Governor Newsom, Sonoma County Board of Supervisors, Windsor Town Council, U.S. Senator Alex Padilla, Representatives Jared Huffman and Mike Thompson, CA Sen. Majority Leader Mike McGuire, and local tribes.

Thank you for your time and consideration.

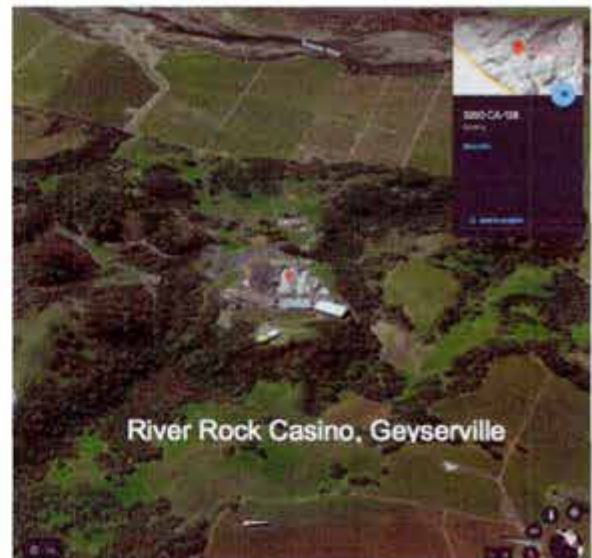
Sincerely,



Sidnee Cox
5846 Leona Ct.,
Windsor, CA 95492



Graton Resort and Casino
Rohnert Park



River Rock Casino, Geyserville



Proposed Koi Casino and
Resort Complex just outside
Windsor's southern boundary.

Above left, Graton Casino, Rohnert Park, is in an industrial and business zone. Above, River Rock Casino, Geyserville, is in a rural area, distant from any developments.

Below, left, the proposed Koi Casino will be located at Windsor's southern boundary. It will be adjacent to residential neighborhoods. The two new apartment complexes impacting evacuation routes are shown in orange.

The proposed Koi project alternatives A, B and C will have significant environmental impact on water resources, traffic, air quality, public services, evacuation planning in emergencies, and more. The most recent EIS does not reduce these impacts to "less than significant."

From: Richard Abend <richardabend13@gmail.com>
Sent: Friday, December 13, 2024 11:20 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments,Koi Nation Shiloh Resort and Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To: Chad Broussard

Environmental Protection Specialist ,Bureau of Indian Affairs.

Subject: FEIS Comments,Koi Nation Shiloh Resort and Casino

Dear Environmental Protection Specialist,

If you are really a EV protection Specialist and not bought out by corrupt people with money and just want to make more money ,you would understand the danger and ought right reasons this project is not right for this area and it would have never gotten this far in the planning stage with the very bias and unsubstantial EIS! The recent FEIS is still not adequately addressing the significant current and future impacts this project would have on our whole community as proposed!

With your promise to consider public comments, it is very evident this rushed FEIS process is not interested in hearing the voices of concern from those that are directly affected. A 30 day comment period during the High Holiday season will effectively limit real public participation! In all fairness this should have been extended given that people have many prior plans and traveling expectation.

I am a resident that has lived in the area ,5925 Old Redwood Hwy, across the street from this proposed nightmare of a casino project for 38 years . I have experienced continued increase of busyness in this area and oppose any type of casino project on this proposed property! This casino resort plan is not acceptable to our community on any level !

For starters ,this is a community with residential homes, churches, schools, recreational parks, a rural county park with creeks and wildlife that stretch to the creek on this property and vineyard agricultural as a green belt protection area. People bike,children wait for school buses, children walk ride bikes to school,the park areas are active with children and families uses around these area roads. Daily traffic and noise is already at it's maximum and will have added use with more recent high density /low income and senior / memory care housing soon to be completed on Shiloh Road and Old Redwood Hwy. Fire evacuation and ER services will also be even more impacted with this current increase of population . Area flooding is a current and continuous problem . This casino project would be a negative impact on this already strained community. This project would bring an added appx 4 times the influx of traffic on Old Redwood Hwy and Shiloh Road ! This traffic would undoubtedly include a population of impaired driving ,drugs , violence and individual bad behavior (prostitution/drug hookups and sex criminal histories). This project would cause the existing community to experience even more difficult Emergency services, fire and ER evacuation(a very real recent reality), poor air quality , more increased noise , increased area flooding and water contamination and ground water depletion and contamination during drought conditions .(many in this rural area have ground water wells) . The ground water contamination and depletion is of special concern to me and others in my neighborhood because we all are well water dependent. People at a resort/casino would not respect or care about this important resource. This peaceful beautiful area and community needs to be safely available for my grand children,other local

residents and visitors to thrive in and not Las Vegas at our front door! This area does not deserve the abuse of a casino resort project with constant in and out traffic of people that don't care about it's quality of life . The mitigation in this basic unchanged FEIS is vague,unrealistic and unacceptable! No other resort/casino in sonoma county is so close to areas and communities of this type. This project would severely and radically change this area and community and the most important reason it should be environmentally preferred as "no project"

The Koi nation needs to stay in their own Lake County area for land trust plans and casino development . Sonoma County has enough casinos .

Respectfully,
Richard Abend
5925 Old Redwood Hwy
Santa Rosa,CA. 95403

To: Amy Dutschke

Regional Director, Bureau of Indian Affairs,
Pacific Region, 2800 Cottage Way
Sacramento, California
95825

PACIFIC REGIONAL OFFICE

2024 DEC 16 PM 2: 15

BUREAU OF INDIAN AFFAIRS

From: 12/13/2024

Richard Abend

5925 Old Redwood Hwy
Santa Rosa, CA
95403

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

Dear Regional Director Dutschke,

If you are really a trusting director and care about communities as well as appropriate land use and not bought out by corrupt people with money and just want to make more money, you would understand the danger and ought right reasons this project is not right for this area and it would have never gotten this far in the planning stage with the very bias and unsubstantial EIS! The recent FEIS is still not adequately addressing the significant current and future impacts this project would have on our whole community as proposed!

With your promise to consider public comments, it is very evident this rushed FEIS process is not interested in hearing the voices of concern from those that are directly affected. A 30 day comment period during the High Holiday season will effectively limit real public participation! In all fairness this should have been extended given that people have many prior plans and traveling expectation.

I am a resident that has lived in the area, 5925 Old Redwood Hwy, across the street from this proposed nightmare of a casino project for 38 years. I have experienced continued increase of busyness in this area and oppose any type of casino project on this proposed property! This casino resort plan is not acceptable to our community on any level!

For starters, this is a community with residential homes, churches, schools, recreational parks, a rural county park with creeks and wildlife that stretch to the creek on this property and vineyard agricultural as a green belt protection area. People bike, children wait for school buses, children walk ride bikes to school, the park areas are active with children and families uses around these area roads. Daily traffic and noise is already at its maximum and will have added use with more recent high density / low income and senior / memory care housing soon to be completed on Shiloh Road and Old Redwood Hwy. Fire evacuation and ER services will also be even more impacted with this current increase of population. Area flooding is a current and continuous problem. This casino project would be a

negative impact on this already strained community. This project would bring an added appx 4 times the influx of traffic on Old Redwood Hwy and Shiloh Road ! This traffic would undoubtedly include a population of impaired driving , drugs , violence and individual bad behavior (prostitution/drug hookups and sex criminal histories). This project would cause the existing community to experience even more difficult Emergency services, fire and ER evacuation(a very real recent reality), poor air quality , more increased noise , increased area flooding and water contamination and ground water depletion and contamination during drought conditions .(many in this rural area have ground water wells) . The ground water contamination and depletion is of special concern to me and others in my neighborhood because we all are well water dependent. People at a resort/casino would not respect or care about this important resource. This peaceful beautiful area and community needs to be safely available for my grand children, other local residents and visitors to thrive in and not Las Vegas at our front door! This area does not deserve the abuse of a casino resort project with constant in and out traffic of people that don't care about it's quality of life . The mitigation in this basic unchanged FEIS is vague, unrealistic and unacceptable! No other Resort/casino in Sonoma County is so close to areas and communities of this type. This project would severely and radically change this area and community and the most important reason it should be environmentally preferred as "no project"

The Koi nation needs to stay in their own Lake County area for land trust plans and casino development . Sonoma County has enough casinos .

Respectfully,

Richard Abend



5925 Old Redwood Hwy

Santa Rosa, CA. 95403

From: Don Hansen <dehansen_200@yahoo.com>
Sent: Friday, December 13, 2024 12:06 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] KOI NATION CASINO PROJECT NEAR WINDSOR, CA

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello,

I'm emailing you to let you know that I as well as others in my community, are opposed to allowing the KOI Nation in setting up a casino in Windsor, CA.

I believe it is not in the interest of our community since there will be increased traffic, noise and possibly crime.

Also since it is in a more rural area and near a Regional park, I believe the environmental harm might be increased exponentially with this project.

I should note that I understand this project/land is far from the KOI Nation's aboriginal territory beside that fact that Sonoma County already has two casinos, one in Rohnert Park, and the other past Geyserville. I don't believe the county can sustain nor needs another casino. Perhaps the KOI should look into a casino more suited for their aboriginal territory, which I heard is Mendocino County?

I also understand that there is widespread opposition from federal, state and local elected officials.

I would hope that our community will have a big say into this project happening or not.

Again, I am in opposition to this project to be built.

Please consider this community's opposition in your decision.

Thank you for your time.

Donald Hansen

resident: Healdsburg, CA 95448

From: claudia abend <abendclaudia@gmail.com>
Sent: Friday, December 13, 2024 11:51 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments,Koi Nation Shiloh Resort and Casino

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To: Chad Broussard

Environmental Protection Specialist ,Bureau of Indian Affairs.

Subject: FEIS Comments,Koi Nation Shiloh Resort and Casino

Dear Environmental Protection Specialist,

If you are really a EV protection Specialist and not bought out by corrupt people with money and just want to make more money ,you would understand the danger and ought right reasons this project is not right for this area and it would have never gotten this far in the planning stage with the very bias and unsubstantial EIS! The recent FEIS is still not adequately addressing the significant current and future impacts this project would have on our whole community as proposed!

With your promise to consider public comments, it is very evident this rushed FEIS process is not interested in hearing the voices of concern from those that are directly affected. A 30 day comment period during the High Holiday season will effectively limit real public participation! In all fairness this should have been extended given that people have many prior plans and traveling expectation.

I am a resident that has lived in the area ,5925 Old Redwood Hwy, across the street from this proposed nightmare of a casino project for 38 years . I have experienced continued increase of busyness in this area and oppose any type of casino project on this proposed property! This casino resort plan is not acceptable to our community on any level !

For starters ,this is a community with residential homes, churches, schools, recreational parks, a rural county park with creeks and wildlife that stretch to the creek on this property and vineyard agricultural as a green belt protection area. People bike,children wait for school buses, children walk ride bikes to school,the park areas are active with children and families uses around these area roads. Daily traffic and noise is already at it's maximum and will have added use with more recent high density /low income and senior / memory care housing soon to be completed on Shiloh Road and Old Redwood Hwy. Fire evacuation and ER services will also be even more impacted with this current increase of population . Area flooding is a current and continuous problem . This casino project would be a negative impact on this already strained community. This project would bring an added appx 4 times the influx of traffic on Old Redwood Hwy and Shiloh Road ! This traffic would undoubtedly include a population of impaired driving ,drugs , violence and individual bad behavior (prostitution/drug hookups and sex criminal histories). This project would cause the existing community to experience even more difficult Emergency services, fire and ER evacuation(a very real recent reality), poor air quality , more increased noise , increased area flooding and water contamination and ground water depletion and contamination during drought conditions .(many in this rural area have ground water wells) . The ground water contamination and depletion is of special concern to me and others in my neighborhood because we all are well water dependent. People at a resort/casino would not respect or care about this important resource. This peaceful beautiful area and community needs to be safely available for my grand children,other local

residents and visitors to thrive in and not Las Vegas at our front door! This area does not deserve the abuse of a casino resort project with constant in and out traffic of people that don't care about it's quality of life . The mitigation in this basic unchanged FEIS is vague,unrealistic and unacceptable! No other Resort/casino in Sonoma County is so close to areas and communities of this type. This project would severely and radically change this area and community and the most important reason it should be environmentally preferred as "no project"

The Koi nation needs to stay in their own Lake County area for land trust plans and casino development . Sonoma County has enough casinos .

Respectfully,
Claudia Abend
5925 Old Redwood Hwy
Santa Rosa,CA. 95403

12/13/2024

To: Amy Dutschke

Regional Director, Bureau of Indian Affairs,
Pacific Region, 2800 Cottage Way
Sacramento, California
95825

PACIFIC REGIONAL OFFICE
2024 DEC 16 PM 2: 15
BUREAU OF INDIAN AFFAIRS

From:

Claudia Abend
5925 Old Redwood Hwy
Santa Rosa, CA
95403

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

Dear Regional Director Dutschke,

If you are really a trusting director and care about communities as well as appropriate land use and not bought out by corrupt people with money and just want to make more money, you would understand the danger and ought right reasons this project is not right for this area and it would have never gotten this far in the planning stage with the very bias and unsubstantial EIS! The recent FEIS is still not adequately addressing the significant current and future impacts this project would have on our whole community as proposed!

With your promise to consider public comments, it is very evident this rushed FEIS process is not interested in hearing the voices of concern from those that are directly affected. A 30 day comment period during the High Holiday season will effectively limit real public participation! In all fairness this should have been extended given that people have many prior plans and traveling expectation.

I am a resident that has lived in the area, 5925 Old Redwood Hwy, across the street from this proposed nightmare of a casino project for 38 years. I have experienced continued increase of busyness in this area and oppose any type of casino project on this proposed property! This casino resort plan is not acceptable to our community on any level!

For starters, this is a community with residential homes, churches, schools, recreational parks, a rural county park with creeks and wildlife that stretch to the creek on this property and vineyard agricultural as a green belt protection area. People bike, children wait for school buses, children walk ride bikes to school, the park areas are active with children and families use around these area roads. Daily traffic and noise is already at its maximum and will have added use with more recent high density /low

income and senior / memory care housing soon to be completed on Shiloh Road and Old Redwood Hwy. Fire evacuation and ER services will also be even more impacted with this current increase of population . Area flooding is a current and continuous problem . This casino project would be a negative impact on this already strained community. This project would bring an added appx 4 times the influx of traffic on Old Redwood Hwy and Shiloh Road ! This traffic would undoubtedly include a population of impaired driving ,drugs , violence and individual bad behavior (prostitution/drug hookups and sex criminal histories). This project would cause the existing community to experience even more difficult Emergency services, fire and ER evacuation(a very real recent reality), poor air quality , more increased noise , increased area flooding and water contamination and ground water depletion and contamination during drought conditions .(many in this rural area have ground water wells) . The ground water contamination and depletion is of special concern to me and others in my neighborhood because we all are well water dependent. People at a resort/casino would not respect or care about this important resource. This peaceful beautiful area and community needs to be safely available for my grand children,other local residents and visitors to thrive in and not Las Vegas at our front door! This area does not deserve the abuse of a casino resort project with constant in and out traffic of people that don't care about it's quality of life . The mitigation in this basic unchanged FEIS is vague,unrealistic and unacceptable! No other Resort/casino in Sonoma County is so close to areas and communities of this type. This project would severely and radically change this area and community and the most important reason it should be environmentally preferred as "no project"

The Koi nation needs to stay in their own Lake County area for land trust plans and casino development . Sonoma County has enough casinos .

Respectfully,
Claudia Abend
5925 Old Redwood Hwy
Santa Rosa,CA. 95403

A handwritten signature in cursive script that reads "Claudia M. Abend". The signature is written in dark ink and is positioned below the typed name and address.

From: Elizabeth Acosta <acostalcsw@gmail.com>
Sent: Friday, December 13, 2024 4:46 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort and Casino Project - Request extension for public comment

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Mr. Broussard,

I respectfully request that the public be granted additional time to review the Final Environmental Impact Statement released 11/22/24. As you know, there has been substantial interest in the outcome of this proposal by governmental and community members who also wish to provide relevant and informed comments. The 30-day public comment period ending December 23, 2024, is not adequate to conduct outreach to notify community members and neighbors and review the FEIS and all responses to the draft EIS and public comment. What's more, we are right in the middle of a holiday period in which community members are distracted and focused on family activity, school vacations, arranging childcare, and supporting their students taking finals and (college students) returning home for breaks. It's unreasonable to expect people to prioritize reading the FEIS over these important family matters.

This is too important an issue, with significant impacts to an entire community, to rush. I join others in requesting the BIA grant an extension to the public comment period. If possible, please notify me if the requested extension is granted.

Thank you,
Elizabeth Acosta
acostalcsw@gmail.com

From: ct6k2 <ct6k2@protonmail.com>
Sent: Saturday, December 14, 2024 9:54 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Santa Rosan Against Koi Casino

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Dear Mr. Broussard:

I am against the Koi Nation building a casino in that area for some of the following reasons:

*It would be built in an intentionally planned greenbelt between the cities of Windsor and Santa Rosa. We don't want our towns to combine to become another San Jose, or Orange County, which it easily could.

*The Koi's homeland is on the North shore of Clear Lake, 60 or so miles away from the proposed location in the greenbelt.

*The use of groundwater would be too much for our often arid area.

*How are they going to treat and dispose of sewage? Pump it into nearby Pruitt Creek, and thence to the Russian River, an important area for swimming and tourism?

*Increased traffic congestion

*Night sky light pollution

*Loss of property values for neighbors

*Increased crime.

Thank you for your time,

Chad Thistle
3529 Deer Park Dr
Santa Rosa,
CA 95404

Sent from Proton Mail Android

From: [REDACTED]
Sent: Saturday, December 14, 2024 11:28 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino

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To Whom it may concern,

I vehemently oppose another casino in Sonoma County. I can not think of any good reason to build another casino but I can think of many reasons to not build one:

1. Main reason to me is NEED
2. Increased traffic, noise and crime
3. Depreciated property values
4. Environmental harm
5. Widespread opposition
6. Maybe give Californians another reason to leave state!!

I will so disappointed if another casino is built!

Sincerely,
[REDACTED]

From: dave carson <stormchsr101@yahoo.com>
Sent: Saturday, December 14, 2024 5:48 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] casino

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hello. this email is to express my feelings about the proposed casino located off of redwood hwy.
im sure that many have opposed this move and i am as well.
i thought the indian nationalities were all about preserving the "land". keeping it as close to nature as possible. there is a well established vineyard on this land which is natural and without destroying any land but rather the land is yielding a wonderful grape crop every year. a huge casino will spoil the land they are suppose to love. we just purchased a home very near there and this will increase traffic and potentially increase crime in our neighborhood. redwood hwy is a busy road to begin with. adding this eyesore will make it so much worse. noise, drunk people, and constant commotion with all the other negative effects will cause a nice area like ours to become basically unlivable. there is other land out there that is farther away from here that they can build what they want. leave us alone please!!!!

From: Kat DePuydt <earthtokat@earthlink.net>
Sent: Sunday, December 15, 2024 4:06 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Oppose Koi Nation Casino plan

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Chad -

Sonoma County does NOT need another casino within our borders. If, for some odd reason, we did need another casino, a tribe whose aboriginal territory originated within our county needs the opportunity to put forth the proposal and financial backing.

If this current proposal goes through, this decision will open up Sonoma County to other tribes from outside the area to buy land, declare the land as their territory, and open a casino. For this and this alone, I oppose the approval of this proposed idea. Koi Nation's aboriginal territory is Lake County, not Sonoma County. Open a casino in Lake County.

With great concern,
Kathleen DePuydt

Sent from my iPhone

From: Mark Hauser <mark.hauser@gmail.com>

Sent: Sunday, December 15, 2024 4:36 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Feedback/Input on Koi Nation of Northern California Shiloh Resort and Casino Project Environmental Impact Statement

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Mr. Chad Broussard,

Attached are my comments/inputs of the FEIS for the Koi Nation Shiloh project.

I appreciate your efforts to address my concerns about the Draft EIS, but I did not have the time to go item-by-item through them. Instead see my comments as they relate to the Final EIS Executive Summary.

Regards,

Mark Hauser
236 Lea St, Windsor, CA 95492

Issues with Koi FEI

From responses to my detailed list of issues previously submitted, it appears that the BIA feels the issues are adequately addressed, or if I have no alternative methodologies to submit, it is all okay.

I am not in the business of evaluation methodologies, so that is an easy one to throw at me. I am however able to read & try to understand. When the stated conclusions do not square with a lay-person's (me) assessment, it is valid to question the evaluation processes in the EIS, both preliminary and final.

Rather than go through each issue previously identified, here are the major issues I see (working my way through the Executive Summary):

1. Acorn Environmental is not an un-biased evaluator. From their website:
 - “Acorn Environmental staff specialize in **supporting Tribal Governments with their fee-to-trust** and environmental compliance needs.”
 - “We have a proven ability to work efficiently and effectively together to achieve **successful outcomes for our clients’ projects.**”
 - It appears to me Acorn has an agenda to render Alternative A as minimal impact event. Since I think it has a much greater impact, I have to question the partiality of the evaluator.
2. Clearly underestimating impacts.
 - The FEI consistently uses the words “The use of BMPs would minimize impacts related to [fill in the issue]. No mitigation required.” BMPs do make the impacts go away, nor render them Less than Significant.
 - Examples:
 - Stormwater runoff
 - Groundwater supply
 - Groundwater recharge
 - Wastewater treatment
 - Crime
 - Drunk driving
 - On-site Noise Sources
 - Shadow, Light, and Glare
3. “good faith efforts” do not remove clear impacts to:
 - police and fire services
 - traffic volumes
4. Inadequate assessment of impact on Existing Tribal Casino Gaming Market Substitution Effects.
 - Only River Rock Casino is assessed. “No mitigation feasible” is acknowledged, but a 24% loss in revenue is much more Significant than Potentially Significant. Does the Dry Creek Rancheria Band of Pomo Indians agree with that assessment?
 - The Graton Resort & Casino impact is not assessed. From what I read in the news, the Federated Indians of Graton Rancheria do not agree that the impact is only Potentially Significant.
 - It appears to me that the U.S. Department of the Interior is being asked to insert itself in economic competition among Indian tribes. The small Koi Nation, backed by the wealthy

Chickasaw Nation of Oklahoma, is trying to siphon revenue from two tribes already firmly established with their gaming licenses.

5. Wildfire Evacuations are addressed by Mitigation Measure B, which could be summarized as “we will develop a plan”. That hardly makes the clear issue go away. It is a very large concern in this fire traumatized area.
6. We have a problem in California with treating Groundwater pumping as a free resource. The approach described appears to continue this thinking. There are a lot of words that basically say “if there is a problem, we will work with everyone on a plan, but we are only paying for what you can clearly identify as our impact”. Groundwater pumping is not free & should enable large ventures like this to just plop down, drill wells, and say no impact. I know this is not a scientific assessment, but it is a stand back and look at what we are doing.
7. Bringing this much traffic to Shiloh Road is not going to be waved away by lane stripping, widening of Shiloh, and widening of the Old Redwood Highway intersection. Plus all these Mitigation Measures have “fair share” contributions that do not cover the full impact. Has the uncovered costs been included in this assessment? Is Windsor, Sonoma County and Caltrans onboard with paying for all this roadwork?

In followup to my item 4, I see that the Lytton Rancheria has alerted the community to provide input to the BIA on the Koi proposal. Theirs is a more succinct statement of concerns, but I agree with all their points.

Voice your concerns today and let the BIA know why the proposed Koi Nation casino project would be harmful to our community:

- Increased traffic, noise, crime
- Depreciated property values
- Environmental harm
- No consultation with impacted tribes
- Land that is far from Koi Nation's aboriginal territory
- Widespread opposition from federal, state, and local elected officials

I'm well aware that my input has little weight, but I have taken the time to express my concerns to support all the others who expressed disapproval of this proposal. While I appreciate the stance of Northern California Carpenters Union, I believe theirs is solely a pocketbook issue.

I appreciate your consideration of my input.

Mark Hauser

236 Lea St.

Windsor, CA

From: rldabney@sonic.net <rldabney@sonic.net>
Sent: Monday, December 16, 2024 11:38 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Good day, Chad,

First, I want to thank you for taking the time to read and consider my concerns. As a neighbor who lives right next to the proposed project (I can see the site from my driveway), I can say with certainty that several aspects of the Environmental Impact Report (EIR) are flawed. It is stated that fire evacuation risks will be mitigated by trained staff and that the egress roads are adequate. However, having been forced to evacuate twice due to wildfires, I witnessed firsthand the chaos, confusion, and panic that occurred. Even during the second evacuation, when people were more familiar with the procedures and routes, traffic on Old Redwood Highway came to a standstill, blocking my road and preventing our family from evacuating. Unless you've experienced this, it's hard to understand the level of fear and panic. Additionally, with a 134-unit apartment complex now adjacent to the proposed site, any emergency evacuation will be even more impacted. To expect a resort full of visitors who are unfamiliar with the area to evacuate smoothly is unrealistic.

Furthermore, we live on a street where our water is supplied by shallow private wells. The projected drawdown of the water table could dangerously affect, if not exceed, the capacity of our neighborhood's wells to function properly.

Additionally, I want to highlight another serious concern regarding the impact on local traffic. We live in a relatively quiet area, and the increased volume of cars generated by this development will inevitably create congestion. This is especially worrying in an area with children's activities at the nearby playing field, where soccer and baseball games are held regularly. The presence of more vehicles, especially from individuals who may have consumed alcohol, presents a significant safety risk to the kids and families who frequent this area. The combination of heavy traffic, unfamiliar drivers, and pedestrian activity could create a hazardous environment that should not be overlooked.

Lastly, many of us who are most directly affected by this project feel powerless in the face of the significant financial resources and polished presentations that are driving it forward. We simply cannot compete with the influence of paid lobbyists who are hired to advocate on behalf of investors. Most of us have jobs and family obligations that prevent us from traveling to present our concerns in person, where you might see and feel the true depth and passion behind them. I ask that you take a moment to reflect on the long-term damage this project could cause to our neighborhood and consider the lasting impact it will have on our lives.

Sincerely,

Rick Dabney

5911 Old Redwood Hwy

Santa Rosa, CA 95403

From: Carol Ann MacDonald <4carolann@gmail.com>
Sent: Friday, December 13, 2024 7:35 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

I am writing to express my strong opposition to the proposed establishment of a casino in Windsor. While economic benefits are often cited as a reason to support such developments, the significant drawbacks—including increased traffic congestion, environmental harm, and adverse effects on family life—must be carefully considered.

A new casino would undoubtedly draw large crowds from within and beyond the region, leading to a substantial increase in vehicular traffic. The current infrastructure is not equipped to handle this surge, resulting in longer commute times, heightened road maintenance costs, and increased risk of accidents. Congested streets would not only

inconvenience residents but also visitors to Sonoma County.

The construction and operation of a casino would likely have detrimental effects on the local environment. Increased traffic would lead to higher emissions, contributing to air pollution and exacerbating climate change. Additionally, large-scale developments often disrupt local ecosystems, harm wildlife habitats, and strain water and energy resources. Windsor has a reputation for its natural beauty, and a casino risks compromising this vital asset.

Casinos often bring with them a rise in problem gambling, which can tear families apart through financial instability, stress, and addiction.

Furthermore, the social environment surrounding casinos can lead to an increase in related issues such as crime, substance abuse, and exploitation, making Windsor less safe and desirable for families.

I urge you to carefully consider the long-term consequences of a casino in Windsor and

prioritize the health, safety, and prosperity of its residents. Thank you for your attention to this matter, and I hope you will choose to reconsider this project.

Sincerely,
Carol Ann MacDonald

From: Paul Sundquist <pvsundquist@gmail.com>

Sent: Friday, December 13, 2024 9:31 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>; Paul Sundquist <pvsundquist@gmail.com>

Subject: [EXTERNAL] Against Koi Nation casino

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Hello Chad,

I am against the proposed casino at Shiloh Road north of Santa Rosa for the following reasons:

1. The proposed casino is out of character with the surrounding agricultural land uses and would destroy the tranquility of the landscape.
2. It would severely impact the area with horrible traffic, noise, air and water pollution.
3. It would have a very harmful impact on the salmonoid and wildlife habitat in the adjacent waterway.
4. It would create an unwanted economy of scales around the project.
5. Property values would plummet on land surrounding the casino and far beyond.
6. Sonoma County has enough casinos now and we don't need another one.
7. There would be no benefit to our community if this casino was built.

Sincerely: Paul Sundquist

From: Laurence Landa <lar@larlanda.com>
Sent: Friday, December 13, 2024 10:17 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] casino

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NO MORE CASINOS IN SONOMA COUNTY.

From: Maria Ramos <marinolyjax@hotmail.com>
Sent: Friday, December 13, 2024 3:36 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Casino in Windsor

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To whom it may concern,

Even though I don't live in Windsor I am a hiker that frequently visits Shiloh Refional Park. I am not a gambler but not against having them but the location of this particular one seems horrendous to me. Not only is it surrounded by neighborhoods and schools but also right next to one of the best parks in the area. The infra structure is not suitable for the traffic a casino o might generate and the peaceful atmosphere of the park will be totally gone.

Please, take the wellness of the people of Sonoma in consideration when making a decision.

Thanks,

Maria Ramos

Santa Rosa

Sent from my iPad

From: Kendra Gonzalez <kendramelissa1@gmail.com>
Sent: Friday, December 13, 2024 3:57 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation casino is harmful to our community

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr Broussard,

I am writing in regards to the proposed Koi Nation casino project in Windsor; and how it would impact our community here in the town of Windsor, the surrounding communities in Larkfield-Wikiup and the Indigenous community from Sonoma county.

First, I believe this project would highly affect the town of Windsor and Larkfield-Wikiup area, being that it would be near Old Redwood Hwy, a major artery for traffic to many of the neighborhoods. In case of an emergency and people have to evacuate, there would be more gridlock traffic as we experienced during the 2017 wildfires. With my own experience having to flee from the Tubbs fire, with my only route being Old Redwood Hwy right down the street from the proposed casino location, I barely escaped the fire area having to navigate through smoky air and traffic. I am concerned with evacuation routes in the event of another wildfire or emergency as the shiloh, and larkfield area is in a high fire risk zone. A casino put in the middle of these neighborhoods would bring more concern about emergency safety and planning, as there would be hundreds more cars added at all hours of the day and night. The Shiloh road exit, which leads to neighborhoods to the east and west of it, already sees an abundance of traffic as there are more small communities being built with only two other routes out. This makes no sense to put a large casino in this small intersection.

Secondly, my concern is for the many parks nearby this proposed casino and the environmental harm it will cause. Local and regional parks would be affected by this casino due to the crime and possible litter. Right across the street from this land is a park with a sports field, it's a family gathering area, and a place for children to play. It is odd for a casino to be placed right next door as it will bring crime and loitering to the nearby parks. On another corner across from the proposed site, is a regional park. The beauty and natural ecosystem is what makes Sonoma county parks unique. With the large construction and traffic, it would disrupt the surrounding environment where many of the endangered species in our county would be harmed. With many creeks and waterways in our area, I worry about trash left behind from visitors to the casino that could end up in our parks nearby.

Lastly, as an Indigenous person native to Sonoma County, the land where my ancestors are from and lived for many years, it saddens me that our tribe and many other local tribes to Sonoma county are being disregarded to our concern and opposition to the Koi nation whose roots are not from Sonoma county building a casino so close to our ancestral homeland; Land that my tribe has fought for many years to return to.

Many local elected officials, the Governor of California, the Sonoma county board of supervisors, Senator Mark Mcguire, Congressman Jared Huffman, The Windsor town council, My Neighbors in Windsor and Larkfield, and My fellow indigenous communities oppose this Casino project. I ask you to take our concerns into consideration.

Sincerely,
Kendra Gonzalez

From: Evan DeRouen <ederouen95@gmail.com>
Sent: Friday, December 13, 2024 5:11 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi nation opposition

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I oppose the koi nation casino in Windsor California.

As a member of federal recognized tribe myself (Lytton Rancheria) there has been a complete disregard for the voices of native peoples who are actually from the proposed site. How insulting and infuriating a tribe who is not even from here push a project like this on our ancestral lands. They are from lake county they should open a casino there. We have established a reservation here in Windsor that my tribe had to fight years for. I am not the only one who feels like this, do not move forward with this proposal.

From: Jean Davis <jeandavis@earthlink.net>
Sent: Friday, December 13, 2024 9:09 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation proposed casino, Windsor, CA

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Sir:

I am writing to oppose the Bureau of Indian Affairs's approval of the casino project.

You're probably aware that the Koi Nation, like many tribes in California, migrated across a number of Northern CA counties. From reading our local newspaper, *The Press Democrat*, it seems to me that the leaders of the tribe have been "reservation shopping" in order to develop the properties they have bought surreptitiously with the goal of development to provide money for tribal members. I think they picked Sonoma County because it is close to the San Francisco Bay area with its large population.

Sonoma County, a beautiful County, is known for agriculture, currently many vineyards and wineries, as well as some poultry and dairy farms. Many of these are organic, and some are still family-owned. We have a tourism industry, but it is balanced with a rural character, a rugged coastline, and many local, County regional, and State parks, as well as several nature preserves. County voters have voted twice to tax themselves to maintain Open Space and separation between our small cities. We already have two casino developments; we also have other American Indian reservations.

The City of Windsor is known for a small town atmosphere. The area proposed by the Koi tribe for casino development is adjacent to one of our County regional parks. Allowing this development to proceed will bring more development pressure to the County, to Windsor, and to the City of Santa Rosa, our County seat.

Please do not approve this proposal. I have lived here since 1980, and I believe the casino project will damage, not improve, this area. Surely the tribe can find other, more suitable options for its members.

Thank you,

Jean Davis

Jean M Davis

jeandavis@earthlink.net

1-707-838-8828 Landline,

From: Christl Unglaub <christlunglaub@gmail.com>
Sent: Saturday, December 14, 2024 10:36 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] More Casino planned

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am against more Casinos in Sonoma County, especially the one planned for Windsor.
I respect all Indian Tribes, but instead of more Casinos, why not do something to educate our children about the history of the Indians, who were the first ones living on this beautiful land.
There are no museums, not much education about the Indians.
When the Casino in Rohnert Park was built the Indian Tribe said they would use the money to use in education etc, what happened? Nothing.
With building another Casino the tribes, no matter who they are, are destroying their own or any land they live on. Do they respect the land? No, their greed is more important.
No more Casinos, especially in Sonoma County.
Respectfully
C. Unglaub

From: sllkdl@comcast.net <sllkdl@comcast.net>
Sent: Saturday, December 14, 2024 2:34 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, 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 are Larkfield residents living within a mile of the proposed site, and we are opposed to the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project.

The final environmental impact statement (FEIS) contains simplified and non-vetted answers by a biased preparation company. Acorn Engineering was cherry-picked and paid for by the Koi Nation and does not provide an unbiased, accurate report with verifiable answers.

A reading of the FEIS will show most answers are either 'Not Applicable' or 'BMP' (Best Management Practices). There is no proof that the item is not applicable, nor is there any description of what the best management practice is in a specific situation, how it will be implemented, how it will be maintained and how it will be enforced.

In short, this is a sham report that should be rejected for being incomplete and inaccurate.

We support the Sonoma based indigenous tribes while the Koi Nation is historically based in Lake County, almost 40 miles away, where it is active to this day. This project is not right for the proposed location. The only way to avoid significant environmental impacts is for the Bureau of Indian Affairs to approve the environmentally preferred "no project" alternative in the FEIS.

Sincerely,

Stephen & Kathleen Lawrence
582 Coachlight Pl.
Santa Rosa, C 95404

From: teatimme@aol.com <teatimme@aol.com>
Sent: Sunday, December 15, 2024 4:33 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Lytton Band of POMO Indian Tribe vs KOI Nation

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Marlene Martin
8621 Lancaster Drive
Rohnert Park, CA 94928
Home: 707-795-0709

teatimme@aol.com

December 15, 2024

Subject: Lytton Band of Pomo Indian Tribe vs KOI Nation

Chad Broussard, Environmental Protection Specialist
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA.95825

Mr. Broussard,

I strongly oppose the proposed KOI Nation casino/hotel project in Sonoma County. As I understand, several officials are not in favor of this including our Governor Newsom.

A few years ago, The Lytton Band of Pomo Indian Tribe went through much stress to reach an agreement with the City of Windsor. They had to fight for water rights and so many other essentials.

I read the POMO tribe had to agree to NOT include a casino on their land, at least not for 22 years and perhaps longer depending on Jarad Huffman's legislative bill he may have initiated in 2017.

How is it fair that the KOI Nation, which is not known in Sonoma County, being considered to construct such an enormous casino and hotel only about 2 miles east of the Lytton Band of Pomo Indian Tribe Reservation?

Shiloh Road has families living there oppose to this KOI Nation project.

Please forward this message to Byron Newland regarding AB52 Law suit.

Sincerely,

Marlene Martin

From: DennyB <db6478@att.net>
Sent: Sunday, December 15, 2024 8:44 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Chad Brossard,

I just don't see how you can even consider approving the Koi Nation Casino on Shiloh Road in Windsor, California. Everyone is against it.

California Governor Gavin Newsom is against it.
Our US Senators are against it.
US Representatives Huffman and Thompson are against it.
Sonoma County Board of Supervisors are against it.
The Town of Windsor Town Counsel is against it.
All of the Local Pomo Tribes are against it. Including Federated Indians of Graton Rancheria, Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria Band of Pomo Indians, Lytton Band of Pomo Indians..

The wildfire evacuation risk is too great to allow this.
It would reduce the value of residences across Shiloh Road.
There is a Church directly across Old Redwood Hwy from the proposed Casino.

We need to keep our neighborhoods safe for the residents.

Also, I went on the Zoom meetings the BIA held and the ONLY people for the project would benefit financially and they didn't have to live with it in their neighborhoods.

If this is approved by the BIA, I have a feeling someone is getting paid off from that wealthy tribe in Oklahoma.
When the Trump Administration takes over in January 2025. there will be investigations, and if this is the case, someone is going to prison.

Dennis Blasi
Oak Creek Subdivision
jdn3223@att.net

From: S Tellyer <regdocqc@gmail.com>

Sent: Monday, December 16, 2024 12:10 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] A voice for No on the Koi Nation casino project in Windsor

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Dear Mr. Broussard,

I'd like to add my voice to those opposed to the Koi Nation casino project in Windsor. Just like a lot of other locals, I am deeply concerned about the potential traffic issues, increased noise, and environmental impact all these additional cars and people in the currently peaceful and rural area will cause.

Having lived through the Tubbs fire, the local traffic jams caused by casino visitors and hotel guests in case of fire evacuation just boggles the mind.

And although we appear to be having sufficient rain this year, those of us who actually live in Sonoma County have experienced years of drought, and the extra water needed for a huge casino, hotel, and (no doubt) a pool is a huge water resource drain.

I do not understand why the Koi Nation, whose aboriginal territory is not Sonoma County, would insist on building here, in opposition to residents, city leaders, and even other area tribes.

Please take all of these issues into consideration when making the decision on whether to move forward with this project.

Many thanks,
Sharon

From: Dillon Gonzalez <dillongonzalez2015@gmail.com>
Sent: Monday, December 16, 2024 2:36 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] CONCERNED CITIZEN: KOI NATION CASINO PROJECT FINAL EIS COMMENTS

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Dear Chad Broussard,

My name is Dillon Gonzalez, I am writing to express concern regarding the environmental impact study for the Koi Nation Shiloh Resort and Casino Project as well as provide my personal comments on the project. As a resident of Windsor, lifelong resident of Sonoma County, and member of our local tribal community, I ask why the comments and concerns of all of the communities are seemingly going unheard. There is much opposition to the project including from the Governor of California, various municipalities within Sonoma County, and the tribal governments historically from here. I want to address the issues of inadequate environmental review, the sidestepping and double standards for local tribes, wildfire disaster implications, and the very concerning truth that Bryan Newland (Assistant Secretary for Indian Affairs) previously worked as a tribal attorney for the Koi Nation, who are attempting to fast track this project.

The biological assessments of endangered plant species occurred outside the time period for when these plants would be present and visible. Their assessment was conducted by Sequoia Consulting on February 22nd and 24th. Many of the CESA listed species are considered annuals, meaning they are only visibly present during a certain period of the year. For instance, they were required to assess CESA species such as *Lasthenia burkei* (Burke's Goldfields) and *Leptosiphon jepsonii* (Jepson's Leptosiphon), however like many of our locally endangered plants these do not bloom until the time period of April through June and therefore were not visibly present during the assessment. It is also acknowledged in the assessment that many of the CESA listed species do occur within the 3 mile radius. As a graduate from the Environmental Sciences department of Sonoma State, it is very well known among the department how environmental consulting firms approach tailoring assessments in favor of the developers of whom they were hired by. Speaking more on the importance of the site. It is an urban-wildlife interface area as the bisecting Pruitt creek provides a vital role for wildlife movement as a migration corridor. Many types of wildlife such as mammals, migratory birds, and amphibious species require Pruitt creek to serve as an artery. An artery for which they can migrate safely away from urban hazards in order to access the ecological important Mark West Foothills located directly to the east. More so the EIS indicated that the endangered California Tiger Salamander does indeed have habitat directly west of the site, where Pruitt creek also runs through, again providing a corridor of dispersal for this endangered species. Many other comments on the DEIS such as one from the Town of Windsor also express inadequacies in assessment and mitigation plans.

There are a total of five federally recognized tribes in Sonoma County. Only two of which have gaming operations. Why is a tribe who is historically located 50 miles away in Lake County, able to fast track a casino project in a fraction of the time it took for local tribes to get land into trust? Many of the local tribes had to follow due process and abide by MOUs put forth

by local governments, some of which barred them from conducting certain operations such as gaming within the county. There is a double standard being placed upon local Sonoma County tribes, and a precedent being set that is a direct threat to tribal sovereignty nationwide if this project is finalized.

This proposed project is also located in a high risk wildland fire area. This area has already seen wildfire twice in the past 7 years with the Kincade and Tubbs fires. In this period our locality saw loss of life and billions in damages. The proposed site would greatly elevate the risk of incurring more such losses, not if, but when we see our next wildfire. Having spent time working for fire department fuels reduction crews here in Sonoma county, there is the widespread agreement that all our wildland areas no matter how close to development are at extreme risk for wildfire. The mitigation plan for the Shiloh project's evacuation again is not adequate and clear in providing any form of assistance to infrastructure to be able to handle such evacuations. Instead they claim on page 3 of Appendix N-4 of the Final EIS that "we understand that no future event will unfold like past events because of changes in emergency response and disasters, such as fires". Site plans show an addition of only 2 new ingress and egress points. Both connect to roads that already serve as vital evacuation routes for families living in the large residential neighborhoods surrounding the Shiloh site directly north, south, and west. East Shiloh rd which will serve 2 ingress/egress points for the Casino is a vital roadway for the numerous family homes and rural properties that are located east of the project. An estimated 5,000+ vehicles of additional traffic would make the difference in life or death for these families come time for a wildfire evacuation. There would also be a substantial increased strain on first responder resources for the area due to the magnitude of the proposed project. For instance first responders who would otherwise begin fire suppression and structure protection would instead be required to prioritize a mass evacuation of the site. Leaving residential family homes bearing the potential cost of total loss.

Lastly I would like to highlight the involvement of Assistant Secretary Bryan Newland with the Koi Nation prior to his swearing in of public office. Bryan Newland previously represented the Koi Nation while at the firm of Fletcher Law. Now as the Assistant Secretary for Indian Affairs he has active oversight of the proposed project as the Department of the Interior has powers in decisions with regards to establishing tribal lands.

Thus, that is why I am pleading, as are innumerable others for this project's halting. The Governor of California, Tribal Governments of Sonoma county, Sonoma County Board of Supervisors, Town of Windsor, Citizens of Windsor are all opposed to this project for all the same reasons. Please hear all of us. Consider all of us.

Thankyou,

Dillon Gonzalez

From: Joyce Jensch <Joyce@consultstonline.com>
Sent: Monday, December 16, 2024 2:39 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino Project

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As a homeowner in Windsor near where the proposed casino will be located I am very concerned about the safety of Windsor citizens if there is a need for an evacuation. The traffic flow at the current intersection is already a mess and the conditions will only worsen with the increase in car traffic. Please vote against this casino project.
Joyce Jensch
6418 Yale Ave.
Windsor, CA 95492

From: <greatsheesha@yahoo.com> <greatsheesha@yahoo.com>
Sent: Monday, December 16, 2024 7:08 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS comments ,Koi Nation Resort and Casino

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 inform you that we strongly oppose the recent attempt by the Koi Nation to develop a casino and entertainment venue at the Shiloh Road area adjacent to the Town of Windsor, in Sonoma County. This is a designated community separator agriculture/open space.

We are 40 year residents of Sonoma County and live in an unincorporated area where we value our distinct atmosphere and neighborhood character. We know the ramifications on our water supplies, wastewater management, traffic congestion, noise abatement and general well being of our way of life when a huge development occurs near where we raised our children and now our grandchildren.

We do not believe the Koi Nation, as an indigenous tribe, has restorative rights to that particular land, since their ancestral homeland is more than 50 miles north in Lake County-not Sonoma County. And further more we understand that this proposed casino is to be financed and managed by the **Oklahoma Chickasaw Nation** and to a much lesser extent the Koi Nation. Can you verify that?

The current mitigation measures outlined in the FEIS (November 22,2024) do not have any enforceable guarantees for our communities and neighborhoods. There are far reaching impacts that will affect our everyday lives.

The BIA has promised to consider public comments but it was just recently we were informed that your comment period will end on Dec 23,2024. This effectively limits meaningful participation by a large portion of the public who will be impacted in Sonoma County. You need to extend this period of public comment immediately.

We know there is massive opposition to this project by local government, state government as well as the community, so we strongly urge you to approve the environmentally preferred "No Project" alternative to the FEIS.

We would very much appreciate a response from you.

Sincerely,
Michael and Alicia Bunce
1677 Willowside Rd
Santa Rosa, CA 95401

PACIFIC REGIONAL OFFICE

2024 DEC 30 PM 12: 54

BUREAU OF INDIAN AFFAIRS

Don Ziskin
5862 Leona Court
Windsor, CA. 95492
Phone 707.292-0779
donziskinlaw@comcast.net

December 18, 2024

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

Re: FEIS Comments, Shiloh Resort and Casino Project

This letter is in response to the Environmental Impact Statement (EIS) published on November 22, 2024, concerning the fee-to-trust application and proposed development of the 68-acre property located on the southeast corner of Old Redwood Highway and E. Shiloh Road in Sonoma County by the Koi Tribe.

The Koi tribe was originally located in Lake County before they lost their ancestral lands. They are currently a tribe with 89 members, 42 of whom live in Sonoma County. The land purchased by the Koi and Chickasaw Tribe of Oklahoma is bordered by Old Redwood Highway and E. Shiloh Road. Across E. Shiloh to the north is a 77 home residential neighborhood and a public park, Esposti Park; residential neighborhoods and vineyards are located to the east; residential to the south; and a senior mobile home park, residential homes and the Shiloh Neighborhood Church directly across the street to the west. A 131-unit apartment complex caddy corner on the northwest corner of Old Redwood Highway and Shiloh Road is slated to be occupied by mid 2025. All residential and no businesses.

As I read through the EIS and Appendices it strikes me as to how out of place alternatives A and B are, and to a lesser extent, Alternative C is. The size and scope of the proposed hotel/casino/entertainment center requires a water treatment facility and a wastewater treatment plant. Between the 5,119 parking spaces, a five story 400 room hotel, a casino with 2,500 gaming tables and a 2,800-person entertainment venue, the facility will be a city within a city! This is a strictly residential, recreational and agricultural area. Placing a 24 hour a day entertainment complex in the middle of these neighborhoods will unquestionably cause significant negative impacts on every household.

Transportation and Circulation

The entire TIS is based on faulty and inadequate information. TJKM was retained to prepare a Traffic Impact Statement (TIS) on the impact the three proposed alternatives, A, B and C, would have on transportation and circulation services in the area. TJKM prepared the TIS with minimal, insufficient and outdated data. The **only** actual data utilized in the TIS comes from traffic

monitors set up between 7-9 a.m. and 2-4 p.m. on January 22 (Thursday) and 28 (Sunday), 2022, and on July 28, 2022 (Thursday). The weather is cold and wet in January and the data collected would be significantly different from that gathered over spring and summer when baseball leagues are active, and people are using the two neighborhood parks. The volume of people using Shiloh Regional Park and Esposti Park is minimal compared to summer months. During Spring and Summer, the parking lot is full, with overflow parking on Old Redwood Highway and E. Shiloh Road. Removing the parking on Shiloh Road for the Casino project will result in park visitors parking in the Oak Park and Oak Creek neighborhoods. Over the spring and summer, the park is used daily by boys' baseball and girls' softball and adult leagues on the weekends. Three days of monitoring (two in January 2022) over limited times periods are inadequate. A more thorough Traffic Study conducted over different time periods more reflective of the actual usage is necessary to determine the impact on the community.

As a retired resident of Oak Park, I had time to evaluate the westbound traffic on East Shiloh Road adjacent to Esposti Park. I took a book and for the week of July 13-20, 2024, I spent considerable time observing and counting traffic. Between 3:30 p.m. to 5 p.m. there were numerous occasions where cars were backed up past the park entrance driveway and on a few occasions when traffic blocked Gridley Drive/Casino entrance 2. Nowhere is the TIS is this mentioned or referenced. Additionally, eastbound traffic, although unimpeded was heavy, especially between 7 a.m. -8:30 a.m. and 3:30 p.m. – 5 p.m. If there is a traffic control stopping eastbound traffic on East Shiloh at Casino Entrance 2/Gridley Drive there will be backup all the way to Old Redwood Highway. This condition was not addressed in the limited study.

The EIS references seven Cumulative Projects in section 3.14.1 (page 3-145) that are either in construction or the Planning and Development stage, four of which are within one-quarter mile of the proposed project. They will bring in approximately 480 new residential households making multiple daily trips within ½ mile of the proposed Casino/hotel complex. There will also be approximately 480,000 square feet of commercial additional commercial space in the same area. While generally referencing in the study that the cumulative projects will have an impact on Transportation and Circulation, there is no specific information in the report or Appendices on how the cumulative projects will impact traffic conditions and loss of services. This will have a substantial impact on local travel and air quality

Appendix I to the EIS estimates there will be 11,213 daily trips and 15,799 Saturday trips to and from the Koi Casino complex. There are estimates of as many as 1,340 hourly trips... or 22 cars per minute. The Traffic Impact Study (TIS) confirms that this traffic increase will have a substantial impact on the roadways and intersection that rise to a level of unacceptable Loss of Services (LOS). The TIS then cites mitigation efforts that will allegedly make the LOS acceptable without providing any substantive information how. It does not offer any concrete information on how the mitigation efforts will improve conditions or any guarantees that they would be effective. The alternatives will undoubtedly cause loss of services. For example, cars traveling on east/west Shiloh road at Gridley Avenue currently have no waiting time. Cars on southbound Gridley have minimal if any wait time to enter Shiloh Road. Signaling this intersection will cause delays.

The TIS also fails to consider how traffic and circulation will be affected when there are special events in the entertainment center. 2,800 people converging on the site at the same time for a concert will have significant impact on traffic and circulation; yet there is no mention of this in the study.

Evacuation

The proposed Alternatives A, B and to a lesser extent C will attract a large volume of patrons and increase the total number of people onsite that will need to be evacuated during a wildfire event. The facility will have parking for over 5,000 cars and will accommodate more people than cars. There will also be people using rideshare and public transportation and any evacuation plans will need to account for this group.

The Project Site has access to two major emergency routes identified by the Town of Windsor, Shiloh Road and Old Redwood Highway (Town of Windsor, 2021). The EIS confirms that an increase in vehicles on emergency evacuation routes during a wildfire could worsen traffic congestion and adversely affect evacuation timelines or access for emergency responders, which would increase the risk of loss, injury, or death involving wildland fires. These are single lane roads which will not only be casino patrons but also used by evacuating neighborhoods. Past evacuations during the Tubbs and Kincaid fires resulting in stopped traffic and dangerous conditions on both of these roads with embers landing around cars. Old Redwood Highway and Shiloh Road cannot handle the addition of thousands of more cars and people.

The EIS recommendations include following best management practices and training employees on evacuating guest in the event of a fire but does not present a plan. The consulting fire expert who prepared the report in the EIS stated, "A comprehensive evacuation plan is critical for life safety". While the report discusses fire detection advances and strategies for evacuations it fails to come up with substantive information on how up to 5,000 cars (and more people) will access and manage the roads in an emergency setting. It also fails to address how visitors arriving by public transportation and rideshare will evacuate. One accident at the intersection of Old Redwood Highway and Shiloh road would devastate an evacuation. Situations like this are not addressed in the report.

Water Resources

Potable water- Surrounding residents in Larkfield and Windsor have been placed on mandatory water restrictions in the past. As recently as July 2021, level 2 water restrictions were placed on Windsor residents. This was not lifted until 2023 and will unquestionably occur again.

The EIS projects that Alternative A would pump between an average of 170,000 gallons per day (gpd) per day to a daily peak of 294,000 gpd from onsite wells; or between 1,250,300 gallons to 2,005,800 per week! The new well(s) will require a water treatment plant to remove arsenic and magnesium and a large storage tank to hold the treated water. Water from the treatment plant would be sent to a one-million-gallon storage tank and then to pumping station for distribution to the facility.

The drawdown on existing wells is a very real likelihood. Global warming, drought and water rights issues are all discounted or ignored factors in the evaluation. The EIS indicates that the onsite wells would be deep wells (700 feet) and that the shallow wells belonging to nearby residents are at most risk. The report discounts the risk, cost and impact of reduced or inadequate water supplies to local residents. Talk of financial consideration or trucking in water in the event of well failures is a substantial impact!

Wastewater

The EIS calls for the construction of a Wastewater Treatment Plant (WWTP) to treat the estimated average of 232,000-335,000 gallons of wastewater discharged each day, or 1,624,000 on an average day and up to 2,345,000 on peak days. Wastewater treatment plants (WWTP) are designed to reduce wastewater and environmental pollution, but the raw materials, energy consumption and emissions from the WWTP subsequently result in different environmental impacts. The process emissions from wastewater treatments account for two thirds of the total greenhouse gases generated by the water and sewage companies. The operation of a wastewater treatment plant involves a range of direct and indirect emissions. These are called the social cost of greenhouse gases (SC-GHG). These are dismissed in the EIS as less than significant.

Figure 2.5 in Appendix D is a diagram of the Project Water and Wastewater Feasibility Study Wastewater Treatment Process Flow. Estimating its size (using the truck as a gauge), the system will be over 500 feet long x 300 feet wide and up to three stories high. There will be hundreds of families living ¼ mile to several hundred yards away who are subject to these emissions. There is also the strong possibility of odor emanating from the plant.

Groundwater Discharge

The project site is currently a 68-acre vineyard. As farmland, the landscape is permeable, allowing for water to permeate the soil. The proposed project will result in over 35 acres of this land being paved and developed, significantly altering groundwater conditions. In addition to the loss of permeable land there is significant risk of pollutants entering Pruitt Creek despite "best management practices". The EIS calls for use of bioswales which "may" keep debris from entering Pruitt Creek but very well may allow other pollutants through. This was determined to be less than significant! This is a subjective determination and someone with the identical information could determine this to be a risk of causing a substantial impact to the environment.

Socioeconomic conditions

Property values- The EIS cites other casinos in California that have had minimal impact on property values within a five-mile radius. In fact, the EIS states that overall values increased between the years 2000 and 2021. This general statement does not provide any substantive information. Property values throughout California, and in these particular areas, all increased during the years 2000 through 2021. There is no information on what the increased values were and how they compared to neighboring communities. Since the announcement of the proposed casino project homes in Oak Park went through price drops before selling. Homes with unobstructed views facing the lit casino on a busy East Shiloh Road will drop significantly in value according to several real estate brokers including one living in Oak Park currently representing a seller.

Crime

The EIS and Appendix B-1 do not provide any substantive information other than the fact that law enforcement received 1,700 calls and made 39 arrests at the Graton Rancheria in its first year of operation. After a comparison of the Graton Rancheria Casino and the proposed Alternative A, the EIS concludes "As a result of this quantitative and qualitative analysis, GMA finds that the negative impacts on community services in areas in which a casino has opened are generally minimal." The report does not include any "quantitative and qualitative" information other than from the 2014.

Drunk Driving

The EIS states "The proposed project intends to serve alcohol consistent with a liquor license, which could result in an increase in drunk driving incidents." It then say "Drunk driving prevalence is not anticipated to increase significantly as a result of the proposed casino resort...". The only mitigation offered is the implementation of a "Responsible Alcoholic Beverage Policy". The conclusion of little impact is not supported by any substantive information.

While this project is controversial because of the unusual nature of fee to trust applications, is not just about the Koi or gambling. Rather, it is about placing a large 24 hour a day 7 day a week entertainment complex in an established residential recreational community. It will cause significant disruption to hundreds upon hundreds of established families and create a risk in the eventuality of a wildfire. It is the wrong project at the wrong location.

To local residents this project seems like a foregone conclusion. The EIS is an evaluation that had a conclusion before it was written. Acorn Environmental has developed a specialty in Fee to Trust applications. Accordingly, all subjective determinations were made in favor of the Koi, their client. It would not be good for business if they concluded the site was inappropriate for development.

There has been zero outreach to the residential community by the Koi or their representatives. The newspaper articles about this project miss the deep community opposition to this casino project and the lack of an avenue for the community to be heard. Photographs and renderings have been modified to intentionally omit showing the adjacent homes. While the Koi Nation's Shiloh Resort and Casino Project is opposed by the State of California; County of Sonoma; the Town of Windsor, local tribes and our State and Federal representatives, it is also overwhelmingly opposed by all residents in the community. Unlike any other casino in California, this one will be surrounded by homes, churches, schools and parks directly adjacent to the site. We urge the Department of Interior to stand with Sonoma communities and stop the casino project before our lives, livelihoods, and shared environment are put at risk.

Respectfully submitted,

Don Ziskin

From: Antonio Salas <antonio13672@gmail.com>
Sent: Tuesday, December 17, 2024 6:47 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Opposition to Koi Nation Casino

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Dear Mr. Broussard:

My name is Antonio Salas. I am a member of the Lytton Rancheria Band of Pomo Indians. I am writing this letter in opposition to the proposal for the Koi Nation casino project in Windsor, California. My tribes' ancestral homeland is in Windsor, and we just recently were approved to take that land into trust and within the last year, many tribal members have moved onto our homeland. By accepting this proposal to allow Koi Nation to build a casino near my tribes' homeland, will not only have negative impacts on my tribe, but it will also have negative impacts on the community of Windsor.

When Lytton Rancheria was reestablished as a tribe in 1991, the state required that the tribe was to never build a casino in Sonoma County, and the tribe has honored that requirement. It makes no sense that now a tribe, the Koi Nation tribe, is even being considered to put a casino just miles from Lytton Rancheria's ancestral homeland. The Koi Nation has no ties to Sonoma County, other than traveling through the area on trails that led to their homeland. Their homeland is located in Lake County, over 75 miles from where they are proposing to build a casino. Had the Koi Nation proposed to build a casino in Lake County, I would not have to write this letter.

By allowing Koi Nation to proceed with this project, you will be bringing more traffic, noise, and crime to the small city of Windsor, which will inevitably depreciate property values in the area. Lytton Rancheria has worked very hard to reestablish our homeland and maintain a great relationship with Sonoma County as well as the state of California. By allowing this proposal to make it this far is like a slap in the face to Lytton Rancheria.

As you may know, Bryan Newland, assistant secretary of Indian affairs, used to represent the Koi Nation Tribe as their attorney before becoming assistant secretary of Indian affairs. In my opinion, this creates a conflict of interest because he has had a previous business relationship with Koi Nation. Also, if this proposal goes forward, it will create a precedent for other tribes to do the same. Bryan Newland could do the same in his home state of Michigan, citing the Koi Nation Proposal, if this plan succeeds. The Koi Nation has made several attempts to make this same proposal to build a casino in the Bay Area. They have not had any success because it is not their homeland.

All local tribes in the Sonoma County area, including Lytton Rancheria, have opposed this proposal and it seems our voices are being disregarded. There is widespread opposition from federal, state, and local elected officials, including Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, state Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson, and U.S. Senator Alex Padilla.

I sincerely urge you to deny the proposal Koi Nation is making. By trying to get this proposal through during the holiday season, it seems that the Koi Nation is hoping the local tribes and the community of Windsor will be more focused on the holidays rather than this proposal. That is not a fair and just way to try and get things done, in my opinion, and the surrounding community will not stand for it. If the Koi Nation wants to build a casino, they can do it in their homeland of Lake County, not in Windsor, less than 5 miles from the Lytton Rancheria reservation. The Lytton Rancheria is not able to build a casino in Windsor, which is our homeland. Why should Koi Nation be able to do it?

Sincerely:

Antonio Salas
Lytton Rancheria Tribal Member

From: Janet Rustigan <jrustigan@gmail.com>
Sent: Wednesday, December 18, 2024 11:10 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Shiloh Casino

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Good day to you Sir,

I am a citizen of Sonoma County, since 1965, here to add my voice in opposition of the proposed Casino. Since 2021 I am living barely more than a mile from the intended building site. Previously, for 17 years, I lived in Franz Valley, NE part of Sonoma County, and my exodus was propelled by the ravages of the Tubbs fire to that neighborhood.

Succinctly, Sonoma County does not need one more casino. (Graton Resort in close proximity and quite accessible!). I've reviewed the obscene building plan ... It detracts from our social environment more than it can possibly add back. I am in favor of redressing past harms to Native communities ... Please can we have projects that serve the needs of the neglected without funneling \$\$\$\$\$ through the hands of the big money grabbers.

If you haven't already, please visit our lovely Shiloh Regional Park. Don't muck it up!
NO on Shiloh Casino.

Regards,
Janet Rustigan

Sent from my iPhone

From: Dennis <bingodennis@sbcglobal.net>
Sent: Wednesday, December 18, 2024 11:36 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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We DONOT approve of having the Shiloh Resort and Casino Project in the Larkfield and Windsor.

Dennis and Toni Dalbec 73 Darcy Drive Santa Rosa, Ca. 05403

From: Robert Pete <rlpete@me.com>
Sent: Wednesday, December 18, 2024 1:35 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Sir,

I'm writing this comment to protest Koi tribe's blatant attempt to acquire land which they have never, as a tribe, occupied either historically or currently. The Koi tribe resides primarily in Lake County, California. They previously attempted the same process in Marin County, California. Since they want a casino & resort my question is why do they not improve their existing Lake County casino rather than, in effect, stealing another tribe's property that they see as more favorable?

Thank you for your time,

Robert Pete
Elder FIGR tribe Santa Rosa Sonoma County, California
855 Daniel Street
Sebastopol, Ca 95472

From: Paul Browning <paul.browning@comcast.net>
Sent: Wednesday, December 18, 2024 6:30 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Mr. Broussard,

Please include my attached comments review of the Shiloh Resort and Casino Project.

Kind regards,
Paul and Stephanie Browning

Dear Chad Broussard, Environmental Protection Specialist, Amy Dutschke, Region Director of the Bureau of Indian Affairs and other BIA officials,

Topic: FEIS Comments, Shiloh Resort and Casino Project

I am once again writing in opposition to the Koi Nations attempt to build a casino at 222 East Shiloh Road in unincorporated Sonoma County, abutting the Town of Windsor and next to my current home of over 25 years. **I strongly support Option D, no project. The draft FEIS compiled by Acorn Environmental is full of point blank lies and factual misrepresentations. It was paid for by the Koi Nations tribe and was written to support their goals of building the Shiloh Resort and Casino. It is literally a paid advertisement.**

My home sits directly adjacent to the proposed casino. As you can see by the pictures, this development will have a profound effect on my family's quality of life. The hotel portion of this project will look directly into the windows of our home. Based on the supplied information, the hotel portion of this project, will be roughly 85 feet from my home. The main entrance to the casino will be roughly 95 feet from my home as well. On the colored aerial map the blue dot is my home and the other picture looks out from my family room to where the hotel and casino will be.





In referring to the aerial photo above, the proposed casino will be constructed among family homes (yellow), churches (blue), parks (green), Esposti Park which hosts T-ball and Little League baseball games during the week and on weekends is highlighted in green across the street from the proposed casino and schools (orange/green). This would be the first full scale casino ever allowed to be built in the state of California that would be constructed among ***an already existing community***. There is no such precedence at this time.

The Environmental Assessment report is far from impartial and factual. I would go as far as to say it is purposely misleading and written with the explicit intent of falsifying information to gain approval of the Bureau of Indian Affairs. The contracted party was only looking out for the interests of the Koi Nation which I am sure is what they paid for.

There are so many false or fabricated points made in the Environmental Assessment, here are just a few as it is overwhelming to try and speak to each and every one of them:

Noise: the EIS states that there will be limited if any increases in noise. How can this be? 222 East Shiloh Road is all vineyards with one residence. The only noticeable noise generated from this property is the occasional spraying in the spring and harvest in the fall, which this year lasted only one night. The proposed casino will employ over 1,000 people and will generate thousands of car trips per day which will extend to all hours of every night. This will result in an endless increase in noise at all hours. It will be impossible for us to keep our windows open, all night during the summer, this added noise that will be created by cars, buses and delivery trucks. From 9 PM to 6 AM there is virtually zero traffic on East Shiloh Rd., if built the traffic will be exponential at all hours of the day and night. The noise will be life changing for us. And to add to this, as I work from home 50% of the time, the noise generated during the construction phase would be intolerable.

Traffic: the same principles regarding noise will extend to traffic. The property currently generates almost zero traffic. The EIS states it will only marginally increase, this is incredibly deceptive. For all intents and purposes, East Shiloh road only sees traffic from the residences in the Mayacama development and those visiting Shiloh Regional Park. With over 5,100 parking spaces for both cars and buses, as well as ongoing delivery trucks, the anticipated impact will be overwhelming. The stretch of Shiloh Road from Interstate 101 to the proposed casino entrance will be one of the heaviest travelled roads, Interstate or Highway in the entire county. Every casino patron, employee and vendor/supplier will have to pass by homes, churches and youth ball fields.

Crime: my neighbors and I have experienced zero crime over the last 25 years. The EIS report suggests very little if any additional violent crime will be seen. I find this incredibly hard to believe. By putting a casino amongst neighborhoods, the inevitable crime that this type of establishment will draw will spill into our streets. Here is a list of just a few of the

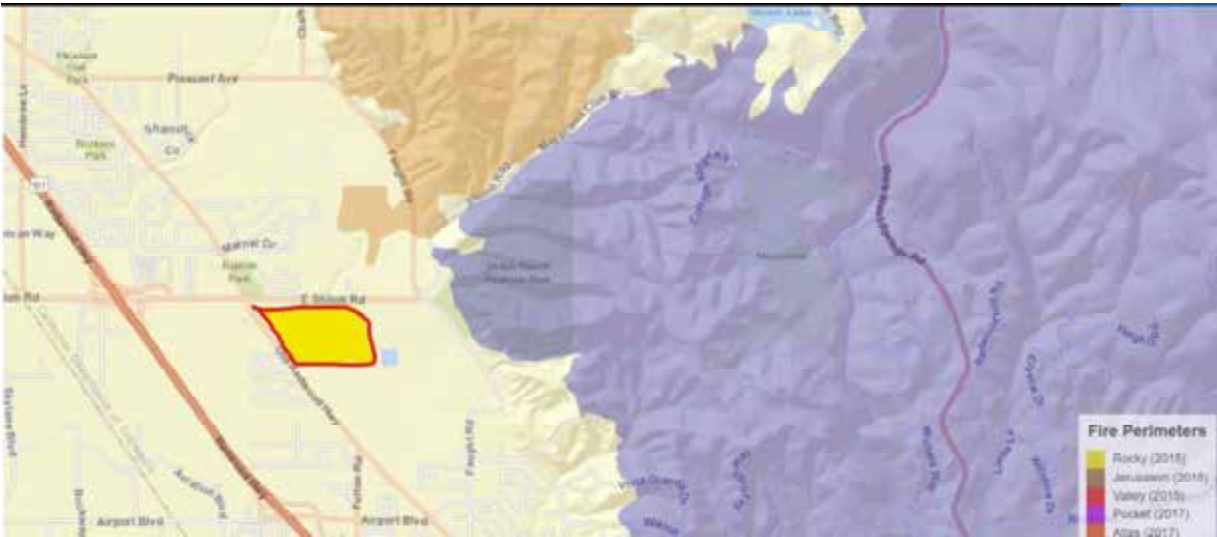
reported crimes generated by the Graton casino in Rohnert Park. Please keep in mind, there are no residential neighborhoods close to this property so at the very least, the communities were buffered, that will not be the case with the Koi's proposal. This is in addition to knowing there will be an increased likelihood of drunk driving taking place on the roads in our neighborhood.

-
- <https://www.pressdemocrat.com/article/news/at-graton-casino-east-bay-couple-arrested-on-drug-weapons-charges/>
- <https://lakeconews.com/news/57880-lake-county-man-arrested-in-assault-at-graton-casino>
- <https://www.nbcbayarea.com/news/local/man-arrested-in-connection-with-assault-with-deadly-weapon-at-graton-casino/1968921/>
- <https://www.cbsnews.com/sanfrancisco/news/lake-county-man-gets-4-years-for-fatal-casino-parking-lot-confrontation/>
- <https://www.cbsnews.com/sanfrancisco/news/2-arrests-made-in-christmas-eve-robbery-outside-graton-casino/>
- <https://www.sonomanews.com/article/news/cops-find-borrowed-car-at-graton-casino/>
- <https://www.kron4.com/news/bay-area/bus-driver-arrested-on-dui-charges-at-graton-casino/>
- Here is a posting from the Sonoma County Sheriff's office from just 2 weeks ago



Wildfire Evacuation: over the last 6 years we have lived through 2 devastating fires, Tubbs and Kincaid. Both of these fires required the surrounding communities to evacuate which caused gridlock and panic. In both instances, the fires burned down to and across Faught Rd. making it completely impassible, for the Tubbs fire south at Shiloh Rd. and the Kincaid fire north at Shiloh Rd. Please see the map below. If a mass evacuation of the community and casino were required, people exiting the casino and heading west would effectively create a roadblock while entering Shiloh Rd. while backing up traffic onto Faught Rd. and into the Mayacama development. This would have the potential of repeating what happened in Maui with gridlock resulting in people burning to death in their vehicles while trying to escape. The EA states that a potential evacuation would be handled by having an individual(s) direct traffic at the entrance of the casino at Shiloh Road. Based on what we experienced during past evacuations, there is nothing one, two or even three people could do to prevent a complete blockage of vehicles that could result in people attempting to flee on foot. The links below are to videos from the Tubbs fire, the last 20 seconds of the helicopter video is of Wikiup Dr. area less than 3/4 mile from the proposed casino site and then the second video is from Vista Grande Drive less than one mile from the proposed casino. A fire in this area could have catastrophic consequences. The EIS's suggestion that a few casino employees could direct traffic to avoid gridlock in such a firestorm is ridiculous.

- <https://www.youtube.com/watch?v=zmAmxkTdElo>
- https://www.youtube.com/watch?v=f2QXrR_zmvM



Here is an estimated amount of time it would take to evacuate the casino and the surrounding area taken directly from the EA. The Tubbs Fire, fueled by 65 mph winds traveled over 12 miles in less than 2 ½ hours. If a fire were to start closer to this area with similar conditions, the results would be catastrophic due to the roads being blocked by fleeing patrons and residents.

- At the signalized exit onto Old Redwood Highway, the exiting would be less efficient due to the signal itself and a higher proportion of other traffic using the signalized intersection. At a service rate of about 800 vehicles per hour, it would take about two hours and 45 minutes to handle all the traffic at this location.

Property Values: the EIS did not use apples to apples examples of casino impacts on property values. In those examples only a few existing homes were already located near the preexisting tribal lands were used for comparative analysis. 99% of all homes were built after the casino was already in operation. Those examples do not even remotely come close to representing established communities like those that surround the property at 222 East Shiloh Rd. How can anyone think a casino and what goes with it would not affect my property value vs. the existing vineyard? Additionally, there is no account given to the expenses current homeowners would incur if they made the decision that living next to a casino and the impacts brought by it would cost. After calculating in 6% realty fees, thousands of dollars in both inspection reports, appraisals and closing costs, the cost to relocate would be \$70,000 or more. This amount would be enough to prevent a family from being able to purchase a similar home in Windsor or the surrounding areas.

Finally as proof of this, my mother-in-law who lives directly across the street from us closed escrow on her house last month. When her home was first listed in March of 2024 she received an over asking price full cash offer of \$1,375,000 within 24 hrs. of the listing, after it was disclosed to the buyer that a casino was being proposed, the offer was rescinded. Final after 7 plus months and numerous price reductions, she was able to sell the property for \$1,075,000 this calculates out to be a reduction of 28%! Once again, the EIS stated there would be no impact on property values, this was absolutely false!

Koi's claim that the property is part of their ancestral home range: it is a well know fact that the Koi tribe does not call any part of Sonoma County home. Their ancestral home is in Lake County. This is proven by their August 2023 lawsuit against the City of Clearlake because a sports complex was going to be built on what they consider is a major cultural site next to the city. Their claim was also supported by a local Attorney General in their case. This is the Koi's third attempt to seek property outside of their indigenous lands. Please see the supporting information.

- <https://oag.ca.gov/news/press-releases/attorney-general-bonta-files-amicus-brief-supporting-koi-nation-lawsuit-against>
- <https://www.pressdemocrat.com/article/news/koi-nation-sues-city-of-clearlake-over-development-of-sports-complex/>

- The Koi Nation should be encouraged to seek a viable alternative in their true ancestral home range of Lake County

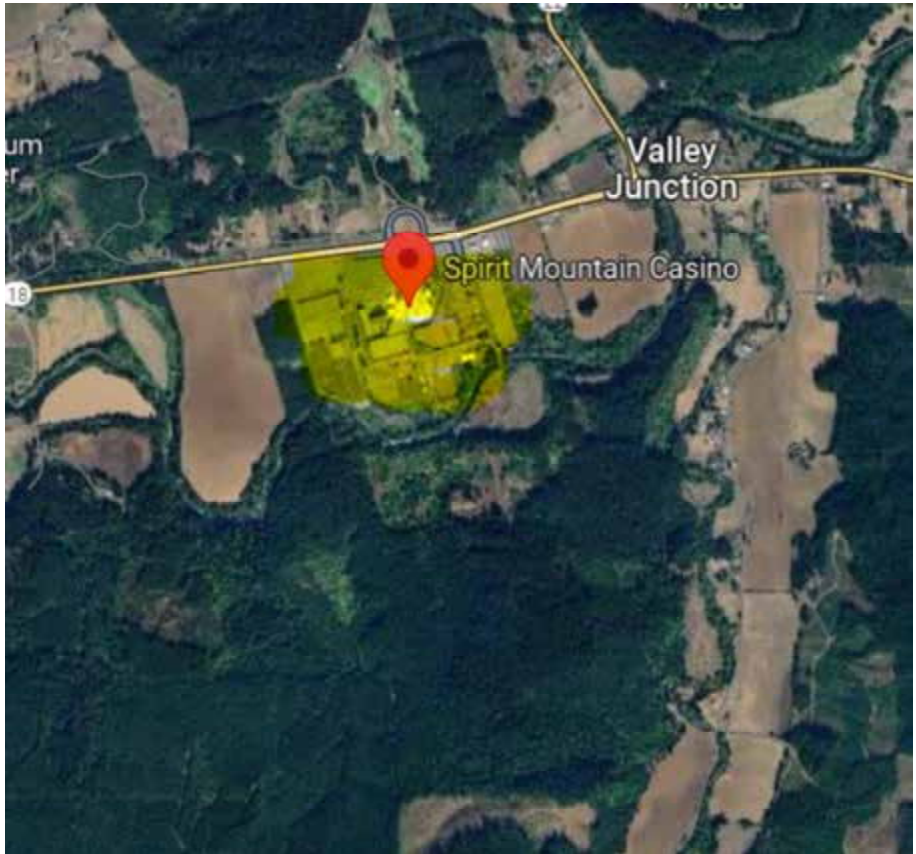
I would like to add a few additional items in relation to the Koi Nations proposed casino project.

- Over the last 2 years as I have conducted business travel attending meetings, seminars and tradeshow, several of these events have been hosted at tribal gaming facilities in California, Oregon and Washington. Given my personal situation I have paid close attention when attending these events to the surrounding areas where these gaming facilities have been located. I am specifically referring to The Ilani (Washington State), Spirit Mountain Casino (Oregon), Rolling Hills Casino and Resort) and Thunder Valley Casino (California). What is abundantly clear is that NOT one of these properties is amongst any type of residential development. There is zero residential on entrance or surrounding these facilities. By allowing this property to be taken into trust and thus allowing a casino to be built, it is setting a precedent of allowing large scale gaming facilities to be build in the middle of **preexisting** family neighborhoods.

Ilani:



Spirit Mountain Casino:



Rolling Hills Casino and Resort:



Thunder Valley Casino:



- With spring, the youth baseball league's season has now started with games being played at Esposti Park (directly across the street from the proposed property, see my attached map, highlighted in green). Last weekend was the first round of T-ball games. I couldn't help but think of the dangers that this mass influx of traffic could have on 5-6 years old being directly in this vicinity, there were kids everywhere. Also, it would be naïve to believe that at least a few of these drivers will not be inebriated to at least certain extent.
- The previous Environmental Assessment reads like a paid advertisement in support of the Koi Nations attempts to push this project through. There are so many inaccuracies and borderline lies that only those who live in this area can recognize. When looking at the number of parking spaces, stated number of employees and anticipated customer visits, the claims of minimal traffic and noise impacts can only be determined as factually untrue. How can you increase traffic by 50 times or more and claim the additional noise will be minimal? Especially considering this will be operating 24/7. The light and noise created at night will be exponential to what it currently is, it is currently zero as it is a vineyard. I would hope that all decision makers would make a personal/physical visit to the location to truly recognize just how detrimental this development would mean to our community.
- Based on the fact that the Koi Nation's ancestral home is NOT in Sonoma County but in Lake County (they continue to litigate against the City of Clearlake because of development on what the Koi claim is one of their cultural sites) I do not support allowing them to take any Sonoma County land into trust. However, if acquiring property in Sonoma County was deemed acceptable (which is shouldn't be), there are other much more appropriate locations such as the former Oluf farm (40 acres) at the corner of Conde and west Shiloh Rd, the old residence and barn was recently bulldozed. It is light industrial/commercial with no residential in the immediate area with direct freeway access. See map:



- Wildfire safety issues. Given the congestion a facility of this type and size will cause. There is the real possibility of mass casualties in the event of another evacuation is needed. In October 2017, the Tubbs fire killed 22 individuals unable to evacuate quickly enough, one death being only ½ of a mile from the proposed property. Other similar events would include the Paradise fire with 85 deaths in 2019 and the Maui fire with 101 deaths just last year. Residents located directly east will be caught in a bottleneck.

It is very obvious that the Koi Nation directed the consulting firm that put the EIS together to paint a picture favoring the construction of the casino and gloss over any negative effects. It is long, in some cases confusing and reads like a paid advertisement. There are too many false details to list in the EIS report.

It is no accident that both United States Senators, both surrounding United States House of Representatives members, Sonoma County Board of Supervisors, Town of Windsor officials, historically based local Indian tribes and many others, have spoken out against the Koi Nations efforts, in addition to hundreds of community members. The only local supporter has been the Northern California Carpenters Union who obviously have entered into a lucrative agreement with the Koi Nation. The opposition has been broad and comprehensive.

For all of these reasons, I am asking you to decide option D, **NO Project.**

Thank you for your time and consideration,

Paul and Stephanie Browning

From: Jim Wright <jwright621@icloud.com>
Sent: Wednesday, December 18, 2024 11:19 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Final EIS Comments, Koi Nation Shiloh Resort and Casino

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>>> Hello Chad, I am strongly opposed to this project. Please see my below comments:

>>> Employee Challenges

>>> Hiring the 1,571 full time employees estimated to be required to operate the project casino would be extremely challenging and could devastate other local area service businesses hoping to hire or retain employees.

>>> Response to Comment A8-25, although primarily geared toward employee housing, is also apropos to hiring employees. The response in part states "...Alternative A would directly employ an estimated 1,571 workers in Sonoma County. Because of the presence of several other casinos in the market area, as well as other hospitality developments, the population already includes people who are seeking casino and/or hospitality-based employment." There is no documentation to support this baseless conclusion.

>>> Also, the State of California Employment Development Department indicated a 4.0% unemployment rate as of June 2024 for Sonoma County. This is expected to increase slightly in the next 5 years when the proposed resort and casino would be hiring employees. A Sonoma County Economic Development Board 2023 Workforce Development Survey of local businesses indicated 63% of respondents experienced hiring difficulties, with insufficient number of applications, lack of skills, and reluctance to accept offered wage as primary reasons. The need and lack of employees is evidenced by "Now Hiring" signs I have personally observed posted in many businesses in the local area. 1,571 employees will be hard to find for the proposed project, and could devastate the labor pool for other local service businesses.

>>> Visual impacts

The proposed project visual impacts for the surrounding areas would be very significant. The current project site includes 59.3 acres of landscaping, consisting primarily of vineyards and ornamental trees and plants. The proposed project resort and casino would include a 5-story hotel, a 4-story parking garage, ballrooms, meeting space, event center, 5,000 space parking lot, 5 restaurants, a 4-story casino, and water and wastewater treatment facilities. A massive project by any measure.

Master response 3.1.9 Visual Impacts states in part: "The draft EIS concluded that with the incorporation of the design features described above... the resulting residual impacts would be considered less than significant." The design features described above include things like locating and painting buildings on the property to "minimize" the impact. There is no way a massive project like the one proposed would not have a significant visual impact, regardless of any proposed design features to "minimize" the impact.

The impact would be particularly significant for the nearby neighborhoods and streets, including East Shiloh Road, Faught Road, Old Redwood Highway, and about 1/2 mile away, Shiloh Ranch Regional Park, an 850 acre park with nearly 8 miles of hiking trails with beautiful views of the surrounding areas, including the project site. The park is enjoyed by numerous Sonoma County residents, including myself, as a way to escape the sounds and sights of the city. The visual simulations of Alternative A in the Final EIS are hugely inaccurate and in no way reflect what a five-story hotel, four-story parking garage, and three-story casino would look like.

>>> Sincerely, Jim Wright, 713 Willowood Way, Windsor, CA 95492 jwright621@icloud.com
> Sent from my iPad

Subject: FEIS Comments, Shiloh Resort and Casino Project

Dear Chad Broussard,

I would like to respectfully submit my comments on the Final Environmental Impact Statement (FEIS) for the Koi Nation Shiloh Resort and Casino Project. The FEIS is inadequate and continues to fail to adequately address the significant and far-reaching environmental impacts this project will have on the surrounding community and Sonoma County. My previous comments seem to have been completely ignored.

I would like to request an extension to the 30-day comment period for this FEIS. The timing of this short comment period during our busy holiday season is limiting meaningful public participation. Because of this reason, I'd like to request a 60-day extension.

I am a lifetime Sonoma County resident and live in a residential neighborhood directly across the street from the proposed site. I have lived in this location for over 20 years and consciously made my decision to live here because of the rural location. The proposed project site sits in the middle of a community separator between Santa Rosa and Windsor, which was voted on and approved by the community. This has been completely omitted in the FEIS. This omission leaves open potential significant environmental impacts. For this reason alone, this application should be denied.

I have been fighting alongside our entire community, local indigenous tribes, local, state and US representatives since the announcement of the proposed site three years ago. Since the start of this fight, the Bureau of Indian Affairs (BIA) has not been listening to the concerns from individual community members or our representatives and local tribes. There have been absolutely no signs of any of the community members, their representatives or their comments being seriously considered. I feel unimaginable frustration over the FEIS which isn't addressing significant environmental impacts.

As a community member who has experienced the fires, floods, traffic and lives with the wildlife and people in the area of the proposed site, I can see how deeply the FEIS falls short. The lack of depth and supporting evidence is unacceptable. This truly feels like it is being shoved down our community's throats and that the BIA is corruptly allowing a NON-NATIVE tribe to push itself into an inappropriate site. A tribe who has tried this on at least two other sites outside of Sonoma County and because they weren't successful, they thought they'd push their way into an entirely inappropriate location in Sonoma County. When an entire community, its local tribes and all their representatives consistently and adamantly are against this and have shown the significant impacts are being ignored, something is very wrong. This process has been rushed especially considering that the previous comment period was completed only months previously and the current FEIS doesn't reflect changes to our significant environmental concerns.

I'm deeply concerned and feel that Acorn Environmental who is a biased organization as they are paid for by the Koi Tribe, rushed to complete this weak FEIS and are making biased and unsupported decisions about how our significant list of environmental issues are easily mitigatable with Best Management Practices. The lack of studies, but the large use of internet data to support their findings is laughable. Little to NO changes have been noted in the FEIS since the DEIS just months ago.

I support our local indigenous tribes. I don't support the Koi Nation, whose ancestral homeland lies more than 50 miles away in Lake County, trying to dump this horrifying project in Sonoma County, ignoring our local tribes who are adamantly against this proposal. The Koi are actively in lawsuits in Lake County and have a very active presence there NOT in Sonoma County. I'm appalled that the BIA doesn't seem to care about our local tribes and our community.

Traffic - The delays which will be caused by the added traffic will impact the time needed driving to appointments, doctor, hospital, schools, and evacuations. The DEIS traffic studies are old and don't reflect the increased traffic due to the housing that has been built in this area.

I don't see any mention of the impact on our local hospitals who are already under sourced. Adding large numbers of gamblers and vacationers into this area daily who will need to use our emergency rooms will significantly impact our hospitals and our community members in need of care.

The DEIS supporting data in many cases is out of date and/or only taken from a website. There are documents from 1968, 1992 through the early 2000's. We need current information reflecting what agencies were contacted. Much of the data collected by Acorn is based on projections and not substantiated information.

The proposed site is currently zoned as a scenic route. The renderings shown in the DEIS will ruin the aesthetics of this location. This is another case where it seems that an unbiased party is stating that their opinion is the new aesthetics are fine.

I've read article after article from Lake County supporting the fact that the Koi originated there and not Sonoma County. The Koi have actively been in litigation there for years.

One Example:

From Lake County Record-Bee Morning Report Thursday July 25, 2024

Koi Nation Files suit against the City of Clear Lake for CEQA violations

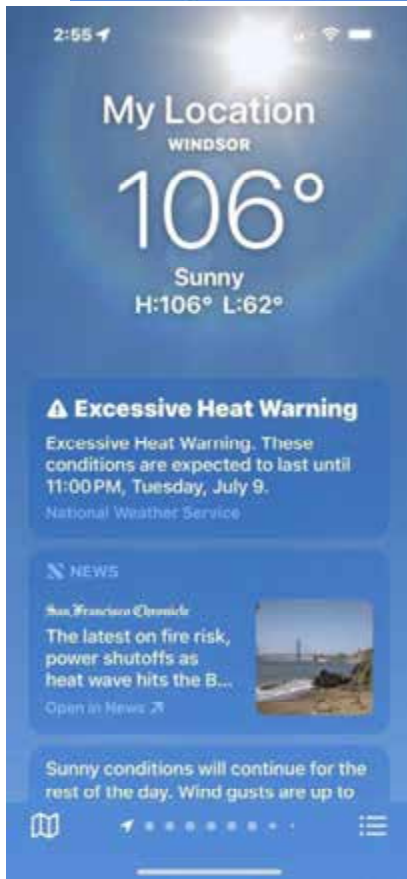
The City of Clear Lake is being sued by the Koi Nation of Northern California which has filed a writ in Lake County Superior Court on June 14, 2024 but received by the city on July 3, 2024.

Our environment is only going to increase in heat which in turn will cause major water issues that haven't been adequately addressed in the DEIS.

July 22, 2024 was the Earth's hottest day on record, according to a NASA analysis of global daily temperature data. It followed 13 straight months of unprecedented temperatures.

Heat increases fire danger (along with gamblers tossing cigarettes out car windows as they leave the casino). And Casino increases heat - they did not take into account that the vineyards SEQUESTER carbon and the casino will have a huge carbon footprint from buildings and parking alone.

July 2, 2024



Board of Supervisors approves Municipal Greenhouse Gas Inventory as baseline for climate resilience, adaptation

[Board of Supervisors approves Municipal Greenhouse Gas Inventory as baseline for climate resilience, adaptation \(ca.gov\)](https://www.ca.gov/boards-supervisors/2024/08/06/board-of-supervisors-approves-municipal-greenhouse-gas-inventory-as-baseline-for-climate-resilience-adaptation)

FIRE

Unlike the FEIS states, most fire evacuations are UNPLANNED. Just this summer we experienced two such evacuations that impacted our community within 2-3 miles of the proposed casino fight. Fires are larger, happening earlier in the year and more frequently. This is only going to get worse. The suggested mitigations for fire are at best weak and won't work. We live with wildfires and the threat of wildfires daily. We live and breathe wildfire preparedness. Our community is frightened for our lives with the thought of the sheer number of people and cars being proposed into our area which amount to almost another Town of Windsor coming in and out daily.

August 6, 2024 Facebook – Cal Fire Sonoma-Lake-Napa Counties

9:56

CAL FIRE Sonoma-Lake-Nap...
5d · 🌐

It's been an active fire year, as this graphic demonstrates. The alignment of high temperatures, consistent gusty winds and the heavy cured fuel bed of grasses and forest fuels has served as a catalyst for fire spread. Stay vigilant and remember, one less spark means one less wildfire.

Visit readyforwildfire.org to learn more on how to prepare for and prevent wildfires.

	2024	2023	5-YEAR AVERAGE
WILDFIRES	209	197	283
ACRES BURNED	23,679	381	1,835
100 DEGREE DAYS <small>From National Weather Service observation stations in LNU</small>	NAPA: 3 SANTA ROSA: 7 VACAVILLE: 25	NAPA: 0 SANTA ROSA: 1 VACAVILLE: 12	NAPA: 1.6 SANTA ROSA: 1.4 VACAVILLE: 16.6
RED FLAG WARNINGS <small>Days under a Red Flag Warning as issued by the National Weather Service</small>	4	0	5
FIRE RETARDANT <small>Gallons used out of our Sonoma Air Attack Base</small>	265,370	29,200	72,354
WATER DROPS <small>Gallons of water delivered from the air by our Biggs Mountain Helitack crew</small>	1,314,412	181,475	213,781

* Preliminary numbers, may subject to change.
** THE CAL FIRE Sonoma-Lake-Napa Unit covers the counties of Colusa, Lake, Napa, Sonoma, and Yuba.

August 3 2024 Facebook - National Interagency Fire

12:48



National Interagency ...

[Follow](#)

1d · 🌐

[#NationalFireNews](#): Released today, Predictive Services issued the National Significant Wildland Fire Potential Outlook for the months of August through November 2024.


Fire activity increased significantly across the western US in the first half of July and remained at extreme levels through the end of the month. With the increase in activity through the first half of July, the National Preparedness Level was increased to four (on a scale of 1-5) on July 10 and five on July 18.

The most significant increase in activity occurred in the Northwest Geographic Area which increased from Preparedness Level two to three July 10, to four July 16, and to five July 19. However, Alaska decreased in activity through the month, going from Preparedness Level five at the beginning of the month to one at the end of the month. California, Great Basin, Rocky Mountain, and Northern Rockies Geographic Areas also observed increases in activity while Southwest Area remained moderately active through the month.

For [#FireYear2024](#), the annual acres burned for the US is above the 10-year average at 123% of normal, but the national average data talks of wildfire

For **#FireYear2024**, the annual acres burned for the US is above the 10-year average at 123% of normal, but the national year-to-date tally of wildfires remains below average, near 82%.

Read the full outlook here https://www.nifc.gov/nicc-files/predictive/outlooks/monthly_seasonal_outlook.pdf

 Graphics by Predictive Services at NIFC.



Significant Wildland Fire Potential Outlook August 2024





July 27, 2024 The Press Democrat

Fires in the West are becoming ever bigger, consuming. Why and what can be done?

https://www.pressdemocrat.com/article/news/fires-in-the-west-are-becoming-ever-bigger-consuming-why-and-what-can-be/?utm_source=article_share&utm_medium=email

July 29, 2024 Press Democrat

'All the factors came together': How California's Park Fire blew up so fast

https://www.pressdemocrat.com/article/news/all-the-factors-came-together-how-californias-park-fire-blew-up-so-fast/?utm_source=article_share&utm_medium=email

July 27, 2024 Facebook Cal Fire Sonoma-Lake-Napa Counties

Flora Fire Less than 3 miles from proposed casino site

My neighbors and I received Nixle Alerts for the Flora Fire as it was less than 3 miles from our homes and the proposed casino site. If we had needed to evacuate immediately and had to compete with traffic from the casino there is a good probability we would have died in the gridlock. There is NO acceptable mitigation for fire in the DEIS.

2:58



Sonoma County Emerg...

Ethan Weatherly · 3h · 🌐

****Flora Fire 100% Contained****



CAL FIRE Sonoma-Lake-Nap...

4h · 🌐

The [#FloraFire](#), on the east side of Chalk Hill Road in Geyserville, is now 100 percent contained. It started Wednesday and burned 36 acres before firefighters were able to stop it. No structures were damaged or destroyed in the fire.

📷 courtesy of [Tenaya Fleckenstein Photography](#)



7:25



Healdsburg...

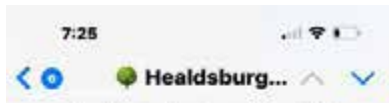
TODAY'S TOP STORIES

1) **A fire out Chalk Hill last week was caused by a guy driving with a busted tire, Cal Fire says**

The [alerts](#) started flowing in this past Wednesday afternoon: A multi-pronged wildfire, consisting of **three spot fires**, **was burning along Chalk Hill Road** in the countryside east of Healdsburg and Windsor. Winds were high and grasses were dry. Locals held their breath while Cal Fire and various other local agencies pounced — including Northern Sonoma County Fire, the Healdsburg Fire Department and Dry Creek Rancheria.

All ended well in a matter of hours, with no reports of evacuations, injuries or burned buildings. Here's the [Cal Fire recap](#) of the short-lived Flora Fire:

The fire was first reported at 4:39.



The fire was first reported at 4:39 p.m. near the 12000 block of Chalk Hill Road. The road was closed to traffic between Spurgeon Road and Flora Ranch Road into late Wednesday evening. The wind driven fire quickly grew to 36 acres before firefighters were able to stop its forward progress at 7:15 p.m.

Within 10 minutes of that firefighting milestone, investigators on Cal Fire's law-enforcement team had **arrested a 44-year-old man named Justin Roy Jones** from the small town of Anderson up in Shasta County, who they say had been driving recklessly through rural Healdsburg that afternoon. He's now facing [felony charges](#) for starting the fire, Cal Fire officials say.

"The subject was observed **driving his truck with no right front tire for over four miles, creating sparks as the truck**



driving his truck with no right front tire for over four miles, creating sparks as the truck grinded on the asphalt," they say. "This caused three separate fires along Chalk Hill Road, threatening multiple structures and burned 36 acres."



Newly charred land out Chalk Hill. (Video: [Cal Fire via X](#))

The [Press Democrat](#) is reporting that this Justin Jones fellow **has a checkered history with the law**, and is facing punishment for other offenses as well:

7:25

Healdsburg...

Jones was on probation for an unknown crime when he was arrested in the aftermath of 4:41 p.m. fire, Cal Fire said.

Jones was arrested for suspicion of unlawfully and recklessly starting a fire and for violation of his probation, Cal Fire said.

He was booked into the Sonoma County Jail around 6:30 p.m. Wednesday for the fire starting offense, a felony, as well as for felony receipt of **stolen property**, **misdemeanor possession of brass knuckles** and two misdemeanor counts of possessing another person's identifying information with the intent to cause fraud, according to jail records.



June 23 Wildfire Stats



June 29 Fire Activity Start of Year



The Press Democrat - A History of Wildfires

https://edition.pagesuite.com/popovers/dynamic_article_popover.aspx?artguid=4cf5ad64-7d1a-41be-bc9e-e3766644d9d4&appcode=PRE341&equid=f192932c-866c-4fe1-946d-c2d35c1f6bc8&pnum=68#

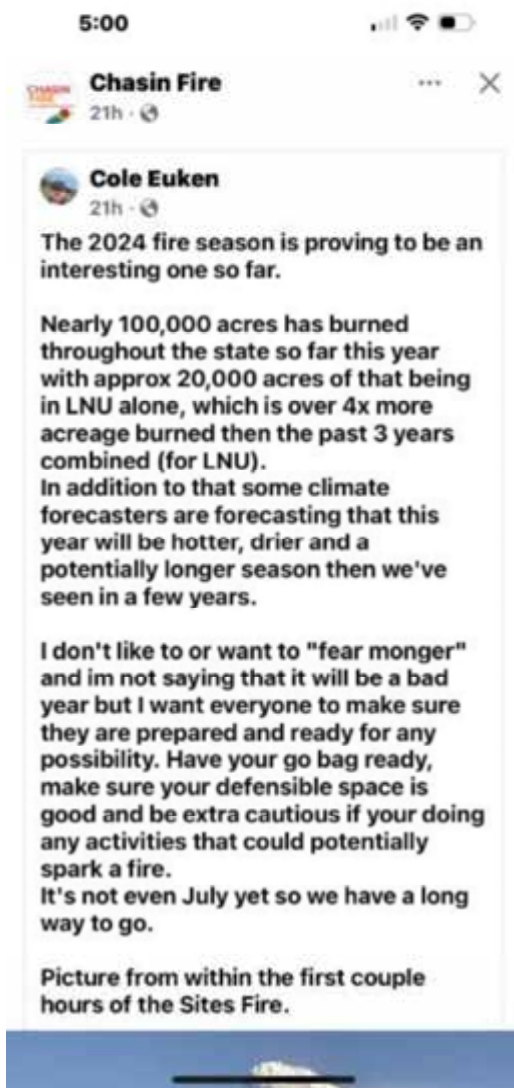
July 29, 2024 COPE Email



FIRE SEASON STARTING OUT IN FORCE

For California, Oregon and other states, this year's fire season is already hitting hard. In only 4 days, Park Fire near Chico is at 368,256 acres and only 12% contained. It is already the sixth largest historical California wildfire, affecting Butte, Tehama, Shasta, and Plumas counties. If you have the Watch Duty app and we recommend EVERYONE does, zoom out on the map to see how extensive the wildfire are in the western US states.

95% of wildfires are caused by humans. The Park Fire and recent Flora Fire on Caulk Hill Rd were both caused by a person with a vehicle; Park Fire by pushing a burning car into a gully and Flora by driving without a tire for miles.

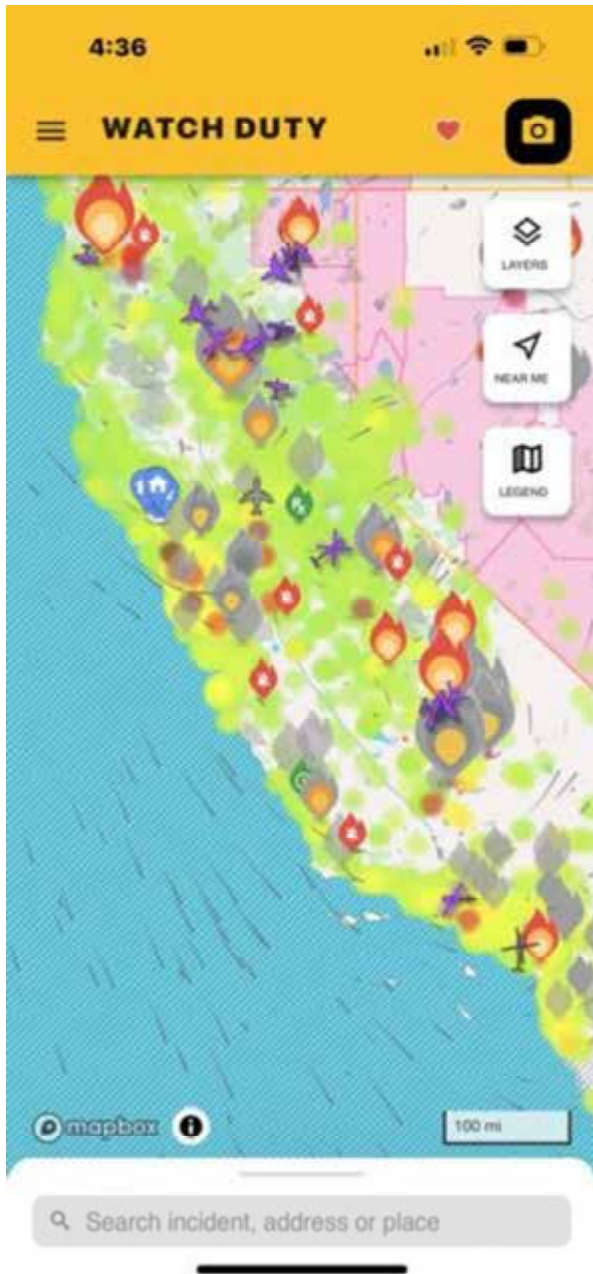


June 11, 2024 Wildfire Preparedness Update to Board of Supervisors - You Tube Video from Supervisor Gore

<https://youtu.be/RAeEv4Sa1tc?si=H8B2HrtfpNnTKzvn>

[Wildfire Preparedness Update to the Board of Supervisors \(youtube.com\)](#)

Watch Duty Reflecting Current California Fires August 21, 2024



July 30, 2024 The Press Democrat - Park Fire Using Local Resources

[Sonoma County emergency personnel deploy to Park Fire - The Press Democrat](#)

August 13, 2024 Nixle Warning - Shelter in Place for Gas Leak

There was a gas leak at the corner of Shiloh and Old Redwood Highway a week ago. This would have been much more complicated of an emergency event with added traffic from the proposed casino. The DEIS doesn't have acceptable mitigations for emergencies including earthquakes and floods.

7:16



888777 >

Text Message
Tue, Aug 13 at 10:47 AM

SON CO FIRE DIST: Gas leak in the area of Shiloh & Old Redwood Hwy, Windsor. Shelter in place for residents on Shiloh between Hembree Ln and Old Redwood Hwy

Tue, Aug 13 at 1:00 PM

SON CO FIRE DIST: Gas leak in the area of Shiloh & Old Redwood Hwy, Windsor contained, shelter in place has been lifted & roadway open nixle.us/FSX5B

The sender is not in your contact list.
[Report Junk](#)



Text Message



Alert Message: Gas leak in the area of Shiloh & Old Redwood Hwy, Windsor. Shelter in place for residents on Shiloh between Hembree Ln and Old Redwood Hwy

From: Sonoma County Fire District (sonoma-county-fire-dispatch@csfd.net)

To: nina.cote@csfd.net

Date: Tuesday, August 13, 2024 at 10:47 AM PDT

Message sent via Everbridge | 707-692-2003 | 10/10/2024

Tuesday, August 13, 2024, 10:48 AM



Sonoma County Fire District
Honesty Respect Integrity

Alert Details

Severity:
Moderate - Possible threat to life or property

Urgency:
Immediate - Responsive action SHOULD be taken immediately

Certainty:
Observed - Determined to have occurred or to be ongoing

Category:
SAFETY - General emergency and Public Safety

Event Description:
Gas Leak

Alert: Gas leak in the area of Shiloh & Old Redwood Hwy, Windsor. Shelter in place for residents on Shiloh between Hembree Ln and Old Redwood Hwy

Dear Nina Cote,

Gas leak in the area of Shiloh & Old Redwood Hwy, Windsor. Shelter in place for residents on Shiloh between Hembree Ln and Old Redwood Hwy

Instructions:

Shelter in place

Contact Information:

Cyndi Foreman
Prevention Division
707-692-2003
cforeman@csfd.net

For full details, [view this message on the web](#)

Sent by Sonoma County Fire District
600 Old Redwood Hwy, Windsor, CA 95452

To manage your email settings, [click here](#). To update your account settings, [click here](#).
If you prefer not to receive future emails, [unsubscribe here](#).

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Alert Message: Gas leak in the area of Shiloh & Old Redwood Hwy. Windsor contained, shelter in place has been lifted & roadway open

From: Sonoma County Fire District (sonoma-county-fire-district@emedia.kiaa.com)
To: nina.cota@sbglobal.net
Date: Tuesday, August 13, 2024 at 01:00 PM PDT

Message sent via Nike (<https://www.nike.com/>)

Tuesday, August 13, 2024, 12:58 PM



Sonoma County Fire District
Honesty Respect Integrity

Alert Details

Severity:
Medium - Possible threat to life or property

Urgency:
Investigate - Responsive action SHOULD be taken immediately

Certainty:
Observed - Determined to have occurred or to be ongoing

Category:
SAFETY - General Emergency and Public Safety

Event Description:
Gas Leak

Alert: Gas leak in the area of Shiloh & Old Redwood Hwy. Windsor contained, shelter in place has been lifted & roadway open

Dear Nina Cota,

Gas leak in the area of Shiloh & Old Redwood Hwy. Windsor contained, shelter in place has been lifted & roadway open

Instructions:

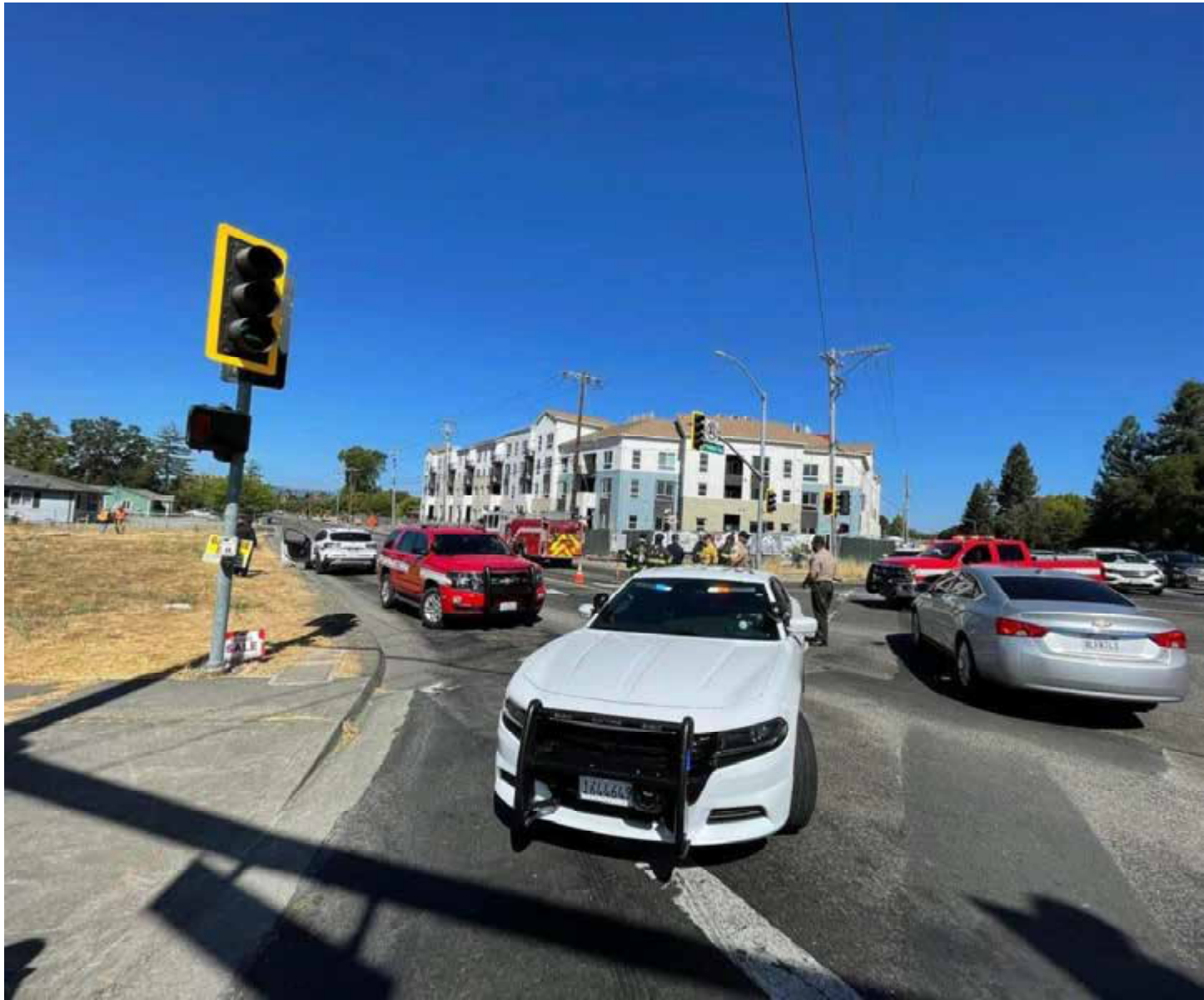
Shelter in place has been lifted and roadway is open

For full details, view this message on the web.

Sent by Sonoma County Fire District
1221 Old Redwood Hwy, Windsor, CA 94992
To manage your email settings, click here. To update your account settings, click here.
If you prefer not to receive future emails, unsubscribe here.

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The proposed site is currently a flood zone and flood plain. There continue to be no mitigations for flooding. This area floods frequently.

Here are photos from December 2024 after a quick storm. This area consistently floods. We have had two storms with flooding during the November/December 2024 timeframe.

Here is supporting data reflecting floods in the past two years.

January 2023, March 2023 and April 2024 Flooding – Proposed Casino Site and Surrounding Neighborhood

Old Redwood Highway and Shiloh Roads

























February 2024 Flood – Old Redwood Highway, Shiloh Road and Pruitt Creek











7:38

Mail



Search Nextdoor



What's on your mind, neighbor?



Town of Windsor ✓



Irene Camacho-Werby · Edited 50m

Update @ 6:38pm

Flooded – proceed with caution!

Shiloh Road east of Hembree Ln. Westbound lane only

Windsor Road @ Pool Creek

ROAD CLOSED due to flooding

Windsor Road @ Shiloh Road

Windsor Road @ Mitchell Lane

Actualización a las 6:38pm

Inundado - ¡proceda con precaución!

Shiloh Road al este de Hembree Ln. Carril hacia el oeste solamente

Windsor Road @ Pool Creek

CAMINO CERRADO debido a las inundaciones



Home



Discover



Post



For Sale



Notifications

AA

nextdoor.com



4:19



Rosa Reynoza for Windsor ... X

22h · 🌐



Town of Windsor, CA

23h · 🌐

Update @ 6:38pm

Flooded – proceed with caution!

Shiloh Road east of Hembre... See more



Drunk driving is listed in the DEIS as less than significant. Controlling drunk driving with Best Management Practices is impossible. Sonoma County already has an issue with drunk drivers. Bringing in thousands of additional irresponsible drinkers is going to accelerate an already significant issue. The proposal has a driveway directly across from one of only two entries to my subdivision. The casino drivers will be driving on our surface and neighborhood roads amongst our family members who are walking, biking, in their yards, walking their dogs and driving. This will increase the likelihood of drunk driving accidents in the immediate vicinity of our family members, schools, parks, churches and senior drivers from nearby senior living areas. This is SIGNIFICANT to our community.

Noise – the suggested mitigations are a bit ridiculous. Dual pane windows! Most homes already have these types of windows, and I can assure you they don't adequately eliminate noise, especially on the level which will be generated from the proposed site during construction and then operation. We live with our windows open to enjoy the quiet, nice breezes and sounds of wildlife. We don't realistically live with our windows closed. The proposed increase in noise from the site is going to destroy the mental and physical health of those sensitive to noise.

Considering all the significant environmental issues surrounding this proposed project and the weakness of the FEIS there is only one option which is for the BIA to deny the application.

Sincerely,

Nina Cote

5828 Mathilde Drive, Windsor, CA 95492

From: Bill Bridges <wbridges@pacbell.net>
Sent: Thursday, December 19, 2024 12:50 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, 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,

I remain very concerned about the Koi Nation/Chickasaw Nation casino being proposed near Windsor, California. Overall, it is the wrong project in the wrong location. How would you like to live across the street from a huge casino? That is what hundreds of residents in Windsor are facing with this proposal. I would like to ask that the Bureau of Indian Affairs get creative and come up with a solution that works for both the Koi Nation and the residents of Windsor. Couldn't the Bureau purchase a commercial parcel near Highway 101 and Shiloh Road and then take control of the land that the Koi Nation purchased? This approach would really solve all of the fundamental problems of a casino in a residential neighborhood. I ask you to consider this or some other reasonable solution.

Thank you for your consideration of my suggestion. I have also included my previous comments below covering my specific concerns.

Take care,
Bill Bridges
6224 Lockwood Drive
Windsor, CA 95492
wbridges@pacbell.net
707-888-8270

My concerns are centered around the following areas:

- Lack of objectivity in the EIS
- Agricultural and Residential Area
- Water Usage
- Wastewater Treatment
- Vehicle Traffic
- Wildfire Evacuation

I'll also suggest a possible solution to this situation at the end of this email.

Lack of Objectivity in the EIS: The EIS was clearly bought and paid for by the Chickasaw Nation and the conclusions are nearly identical to the Environmental Assessment. Because of this fact, it is an inherently flawed document and cannot be trusted without an independent review.

Agricultural and Residential Area: Overall, a development of this magnitude would never be permitted in this location. It is currently a vineyard located right next to a residential area. Most of the vineyard would be destroyed and replaced by the casino, a 5,000 vehicle parking garage, a surface parking area, a water treatment plant, and a wastewater treatment plant. The residents next to the casino complex would be subjected to traffic, pollution, and constant noise. Simply put, this is the wrong facility in the wrong location. I hope the Bureau of Indian Affairs takes this into account and respects the concerns of the nearby residents, not just the wishes of the Koi Nation.

Water Usage: Water is planned to be supplied by wells which would deplete our already tenuous ground water reserves. The water usage projections indicate a huge amount of water will be extracted every month. We have been in a long-term drought environment and this type of water extraction rate would be a significant impact. As there are no restrictions on the tribe's water usage, these estimates may be vastly understated.

Wastewater Treatment: Wastewater is proposed to be treated onsite and disposed of into Pruitt Creek. The amount of wastewater would be very large and would significantly impact this small creek. As with water usage, tribal lands do not have to comply with any local, state, or federal requirements. The volume of wastewater could be significantly greater than what is proposed.

Additionally, solid waste would be hauled off to a landfill. The amount of fossil fuels used would be significant to accomplish this task. It is also problematic where this solid waste would be dumped and what toxins may be present.

Vehicle Traffic: The traffic generated by this casino would be huge. The impact on our residential neighborhoods would be extreme. The streets around this area are inadequate for this type of use and the mitigation solutions are minimal and would be ineffective.

Wildfire Evacuation: We have had a recent history of wildfires which have required mass evacuations. Streets become gridlocked at these times. Having another 5,000 vehicles trying to use the roads is unimaginable. The proposal indicated that workers will direct traffic. It is clear that the tribe's consultants have no idea of what happens during a mass evacuation under extreme circumstances. We had a situation where workers abandoned a senior care center during a wildfire evacuation and left the residents to be on their own!

Possible solutions: I would support a casino located at the intersection of Highway 101 and Shiloh Road. There are commercial parcels in this area that would be amenable to this type of development. Traffic concerns would be reduced and use of public potable water and wastewater treatment would be available. Wildfire evacuations would be more feasible.

The current site could be sold so that it could continue to be operated as an agricultural operation. Perhaps the federal government could make the tribe whole financially if required. Why not try to come up with a solution that is a win-win for local residents and the Koi Nation?

For these reasons, I believe the proposed casino should not be approved.

From: Sebastian Billy <sebastianbilly786@gmail.com>
Sent: Thursday, December 19, 2024 11:55 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Opposition to Koi Nation's Proposed Gaming Project in Sonoma County

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Sebastian Billy
UCLA Alumnus
Member of Lytton Rancheria

19 December 2024

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 a member of Lytton Rancheria, I am compelled to express my concern over the Koi Nation's proposed gaming project in Sonoma County. This proposal is not only deeply unjust but also sets a dangerous precedent for other tribes to pursue similar strategies that disregard local history.

The Koi Nation is not from Windsor or even Sonoma County—they are from Lake County. Despite this, they have arbitrarily changed their name and relocated their headquarters to Santa Rosa to give the false impression of belonging to this area. This is a disingenuous effort to align themselves with Sonoma County and should be treated as such.

Lytton Rancheria, on the other hand, is from Sonoma County and had to fight for over a decade (May 2009 - January 2020) to reclaim our homeland in Windsor. Our agreement to forgo gaming on this land reflects our commitment to be here, even at the expense of financial gain. The Koi Nation's demand for land in Sonoma County shows the opposite motivation. They do not care about this area—they simply want money. Hence, it should be apparent to the Bureau of Indian Affairs that giving the Koi Nation gaming privileges in Windsor, which Lytton Rancheria does not have, would be unjust. It would reward a tribe that has no rightful claim to Sonoma County while disregarding tribes like mine, who fought tirelessly to reclaim our homeland and succeeded only by way of compromise.

Furthermore, this is not just a local issue—it is a question of fairness and integrity in how tribal sovereignty is respected and exercised. Decisions made here will set a

precedent for years to come, and it is critical that they reflect justice and adherence to historical truth. Otherwise more tribes from far away, potentially even outside of California, will do the same thing as the Koi Nation. That is because there are large populations of out-of-state Indians living in California due to past relocation policies. Now that they are here, their respective tribes can use the same strategies as the Koi Nation to get land put into trust. And, of course, other tribes around the country will do the same thing in other states. I urge you to reconsider your position on this issue so that you can avoid setting this dangerous precedent.

Thank you for your attention to this matter. I trust that the concerns of tribal communities will be given the weight and respect they deserve.

Sincerely,
Sebastian Billy
UCLA Alumnus
Member of Lytton Rancheria

From: Sebastian Billy <sebastianbilly786@gmail.com>

Sent: Saturday, December 21, 2024 6:04 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Re: Opposition to Koi Nation's Proposed Gaming Project in Sonoma County

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

A hard copy of this letter was sent on December 21, 2024.

On Thu, Dec 19, 2024 at 11:55 AM Sebastian Billy <sebastianbilly786@gmail.com> wrote:

Sebastian Billy
UCLA Alumnus
Member of Lytton Rancheria

19 December 2024

Chad Broussard, Environmental Protection Specialist
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, California 95825

Dear Mr. Broussard,

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Thank you for your attention to this matter. I trust that the concerns of tribal communities will be given the weight and respect they deserve.

Sincerely,
Sebastian Billy
UCLA Alumnus
Member of Lytton Rancheria

From: Josh Ratiani (Shiloh Neighborhood) <josh.ratiani@shilohnc.com>
Sent: Thursday, December 19, 2024 1:24 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Attached are my comments on the FEIS.

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

FEIS Comments, Shiloh Resort and Casino Project

December 19, 2024

Submitted by:

Rev. Joshua Ratiani
Pastor, Shiloh Neighborhood Church
5901 Old Redwood Hwy
Santa Rosa, CA 95403

To: Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

I am writing in response to the Final Environmental Impact Statement. When the Draft EIS was published, I brought forth a number of concerns that were not addressed in the Final EIS. According to Appendix P, DEIS comments were supposed to be addressed, and a number of mine were not. So, I have included those comments once more, here.

Our church is located directly adjacent to the proposed Casino, and its main entrance would be at our church's southern driveway. However, as noted in my prior comments, various appendices in the EIS continue to show the Casino entrance in different places relative to our church's driveways. This is a significant oversight in the EIS and appendices.

The EIS attempts to mislead decision-makers by painting the site as near a large-scale shopping center. The immediate neighbors of the site include the church, residential areas, and two parks. All of these neighboring properties experience a peaceful, idyllic setting. Section 3.9 notes that development of the property would conflict with county land use plans, but determines this to be less than significant impact because the land would be taken into trust. This is a mischaracterization—it is a significant impact to ignore the wisdom of those who planned with wisdom and experience—county and town leaders who have personal knowledge of the area, and a vested interest in its well-being.

The people who live, play, and worship near the site have built lifestyles consistent with being near an agricultural zone. Because our county had planned on this land never being developed, those who live life in this area built lifestyles that are consistent with this designation.

For example, our church has evolved over time to incorporate more meditative, contemplative practices. We use our open space, and views of the surrounding area to encourage people to meet the Creator. Our church practices times of silent prayer and meditation. We have led groups of spiritual direction and counseling, and engaged in other practices that make sense in a rural, pastoral setting.

The EIS suggests that noise can be mitigated by resurfacing the roads, but does not address the common sense reality: simply adding another signalized intersection in front of our church changes the volume

for our church. Cars make more noise when accelerating. This acceleration would now be just a few feet from a place of prayer and worship. Our property has been an asset for a church that encourages silent prayer, nature walks, and the like. These benefits would be lost.

Thus, using the federal trust process to bypass municipal and county land use code is a significant impact. While legal, it is not ethical, nor dignifying. It does not seek the well-being of those who live in the community.

Incongruous Land Use

Adding a driveway across from either one of our driveways causes headlights to shine directly into our place of worship, right onto the pulpits and platforms used by both our church and the other religious groups that meet in our facility. This is a very simple, obvious example of how casino development conflicts with existing land use.

The driveway for the church is also the driveway for the parsonage—the housing for the pastors. Imagine building a casino entrance at the entrance to a monastery or convent. Like those types of buildings, a church parsonage is intended to be a home for clergy that lends itself to prayer and meditation. The absurdity of building a casino entrance at the entrance to a spiritual center is stark. The existing land use is different from the proposed land use *in the extreme*.

Section 3.9.3.2 attempts to mislead decision-makers. This section notes that the casino is not consistent with the immediate neighbors, but hurries to assert that the land use is consistent with the commercial sites .3 miles away. While having these big box stores .3 miles away sounds like a nearby land use on paper, it is not a realistic depiction of day-to-day life in the Shiloh Neighborhood.

People enjoy their quiet backyards. They walk their dogs in Esposti Park or on our church grounds. Worshipers enjoy times of contemplative reflection as they silently meditate and pray, or simply enjoy watching birds on the church grounds. They are not doing those activities in the Home Depot Parking lot; the .3 miles make a drastic difference.

People come to the church for recovery groups, battling addictions to alcohol and gambling. It does not make sense to build a bunch of bars and a casino across the street. Those bars and restaurants might be appropriate across the street from Panda Express, KFC, and Burger King, but the .3 miles make a drastic difference.

Families attend our church, allowing their children to run in the field, or on our playground. These same families would not let their children roam the Wal-Mart parking lot on their own. The .3 miles make a drastic difference.

The idea that the land use is in any way consistent with surrounding properties is ludicrous, and should not be in the EIS, as it is attempting to paint over the reality with a half-truth. A fair EIS would say that alternatives A, B, and C would be significantly inconsistent with existing land uses adjacent to the property. And there is no way to mitigate for distance, besides moving the casino to a different location.

The Casino website indicates the entire property would be non-smoking. While it is commendable to propose a smoke-free property, this simply pushes smokers and loiterers onto the adjacent properties—the church’s parking lot, Esposti Park, or the neighborhood. Again, this is an obvious problem, if the EIS was honest about the conflicts with adjacent land use.

Engage in a simple, common-sense thought experiment. Imagine someone rides a bus up from San Francisco to visit the casino. This person needs to take a smoke break, but cannot on the casino property. Are they going to walk fifteen minutes to smoke in the Home Depot parking lot? Or are they simply going to cross the street to smoke in the church parking lot, the park, or neighborhood? Of course they are going to cross the street, loiter in front of our homes, and litter in our streets, parking lots, and yards.

One can imagine a different hypothetical: what if the casino was *actually* proposed adjacent to the commercial area, near Hembree Lane and the freeway? Perhaps, then land use, noise, traffic, and the like could be characterized as creating “less than significant impact” or “potentially significant impact.” However, building a casino across the street from neighborhoods, a park, and a church inherently creates a significant impact in all those areas. This is the reality, but the EIS attempts to cover up reality and obscure truth.

At best, the EIS fails to recognize that the proposed site is at an urban/rural interface, and that means that .3 miles away is far more urban than the location of the proposal. At worst, the EIS attempts to cast the location as rural when convenient, and cast the location as urban when convenient. It is either ignorant of an obvious reality, or manipulative and misleading.

Illogical Mitigation proposals

The mitigation proposed in 3.9.3.2 is to add a visual buffer of 100-500 feet. This mitigation proposal is irrelevant for the church, because the intersection would be **zero** feet from our property, and just a few steps from our place of worship. So, any claim that this mitigation creates less than significant impact is patently false. This means that **no mitigation** has been proposed to address the land use conflict or noise issues when it comes to the church, because the 100 foot buffer becomes 0 feet at the church. The irony is that the EIS notes that churches are one of a handful of “sensitive receptors.”

The other primary entrance faces the same problems. Gridley Drive is adjacent to a neighborhood and park, also “sensitive receptors.” Again, having an entrance means that the proposed agricultural buffer of 100-500 feet shrinks to **zero** feet. Those who proposed these mitigation measures display a lack of genuine concern for how the development impacts the lives of the people here.

The reality is that there is no good way to mitigate the problems if intersections are built. But these places need mitigation because they are sensitive receptors. In other words, it is evident that the proposed development is significantly incongruent with the existing surrounding land uses. The EIS should say that Alternatives A, B, and C have a significant impact regarding land use compatibility.

The noise mitigation proposed affects Old Redwood Highway from Shiloh Road to the Casino Main Entrance. Two of the main mitigation projects would be lower noise pavement, and double paned windows in residences. Neither of these mitigation proposals help the church, as it is right at the Casino Main Entrance. Thus, the pavement in front of the church would be unaffected, and since the church is not a residence, the windows would not be affected.

The EIS admits that the church is a sensitive receptor, but makes no efforts to mitigate these negative sound impacts for the church. The EIS then turns around and claims that mitigation will create Less than Significant Impact. At best this is an oversight, at worst, this is deceit.

Misleading Imagery & Visual Impact

Another area in which the EIS is deceptive is the collection of images in section 3-13. Some of these images are taken from low angles, using wide-angle lenses that distort heights, such as the image 3.13-2. This image shows two nearly perpendicular roads as if they were parallel. This is extreme distortion, and misleading. The images of the existing view and proposed views should be taken with 35mm lenses from standing height, on the road. Figure 3-13.3 is taken from Shiloh Road, but far to the east. It shows the parking structure, with the more massive casino being hidden on the far right of the image. Figure 3-13.4 says it is on Old Redwood Highway, but is from the far southwestern corner of the property, far away from the proposed buildings, causing them to appear smaller.

These images were created in a way to obscure the true scale of the development. The EIS (3-137) says the views would be substantially altered, “as shown” in these images, but provides images that do not show the full scale of the problem.

Why are there no images from the parts of the road closest to the actual casino floor and hotel? The view from the church driveway is not displayed. The view from Gridley drive is not displayed. The Shiloh Neighborhood Church building is only two stories tall, but is quite visible from the corner of Shiloh and Gridley. A 65-foot building would stick out like a sore thumb, but the EIS refuses to portray the casino from the actual entry points.

Over the past 15 years, I have taken hundreds of photos of Shiloh Ridge from the church driveway. Every day I walk to get the mail from our mailbox—the location of the casino’s proposed main entrance.



The above photo was taken from a standing height, at the church mailbox, on Old Redwood Highway. The dark line of trees is the Riparian Corridor at Pruitt Creek. The Casino would be taller than these trees, blocking much of Shiloh Ridge. A serious, respectable EIS would show how drastically this view would be altered.

Again, the EIS falsely claims the visual impact will be mitigated through the vineyards along the perimeter (3-137). Again, this mitigation is irrelevant for the two entrances, where the road cuts through those ornamental vineyards. It is also absurd to claim that five-foot high vineyard rows will block the view of a 65 foot building, especially when Old Redwood Highway is elevated a few feet above the surrounding ground level across from the church. An honest attempt to depict the view of the casino from its entrances would reveal the truth—the view would be significantly altered.

Community members regularly stop by the church, sit in the parking lot, and enjoy the view. We encourage worshipers to do the same as they arrive at and leave from church services. I regularly ask worshipers to look out the window at the natural beauty during my sermons. Attendees of AA groups at the church comment on the tranquility provided by the view.

For many years, our church has hosted a multi-church Easter Sunrise service, gathering with members of other churches in Windsor. We gather in our front parking lot, between the two driveways, and watch the sun come up over Shiloh Ridge. In an imagined future, worshipers would come together and watch the sun rise right over casino, to celebrate our greatest holy day. The EIS claims that the effects on Viewsheds would be less than significant (3.13), but this is patently false.

The EIS is not interested in giving a realistic portrayal of how significantly things would change, but seeks to only put the best foot forward. The images in 3-13 might be appropriate in marketing material for the casino, but are inappropriate for the document that is supposed to help decision-makers have the information they need to make wise decisions. The EIS is misleading ; Alternatives A, B, and C would create a significant impact.

My bedroom window is much closer to the proposed building location than any of the pictures in Section 3-13. My life would be affected in a way much more significant than these photos show. Those who have chosen to live in the neighborhoods bought homes with the expectation that this property would not be developed—that their views of Shiloh Ridge would endure. If the land is taken into trust, the county's land use designations can be ignored, and a 65-foot tall building will permanently scar this view.

I have hosted times of stargazing on the church's property, and have enjoyed observing Great Horned Owls and bats here. So, I appreciate an effort to control lighting. The EIS says the casino would follow Dark Sky Association practices. However, the examples of following those practices include limiting lighting to sixteen feet above ground. My fence is far shorter, so these lights would shine right into my bedroom window. My house is just a few feet from the proposed Loop Road, which would have to be lit.

2-19 notes that indirect lighting on signs will be visible from adjacent sensitive receptors. In other words, I will also have those new lights visible from my children's bedrooms. On top of all this, a brand new traffic light, with its colorful changes would be right in front of my house. These are significant impacts—no matter how much mitigation is proposed.

Insufficient concern for fire

The EIS claims mitigation will cause a less than significant impact in evacuation due to wildfire. This is an egregious lie, as it ignores the findings of Appendix N-2.

Appendix N-2 envisions what it deems a "worst-case scenario." It envisions a fire situation like the 2017 Tubbs Fire, and compares it with a fire like the 2019 Kincade Fire. The Tubbs Fire affected the area south of the casino, while the Kincade fire affected the area north of the casino. Someday, a wildfire will affect both Windsor and Wikiup simultaneously. It is not a matter of if, but when.

Shiloh Ridge is a fire-prone region. The EIS makes some plans for evacuation, but fails to recognize two crucial realities. Coordinating evacuation can help people get off the property, but there is simply no way to deal with the increased number of vehicles on the road in an evacuation. **Appendix N-2 acknowledges that the Casino will create a 60-105 minute increase in evacuation times for a no-notice evacuation.**



In the 2017 Tubbs Fire evacuation, cars backed up for two hours to escape from the south. The photo above is from the Casino Main Entrance at 2:42 AM. In this fire, only Larkfield-Wikiup was evacuating, not Windsor, and there was no casino.

In the 2019 Kincade Fire, there was time for a staged evacuation, since the fire was to the north. But, what if a fire started on Shiloh Ridge? Then both Windsor to the North, and Larkfield to the South would have to evacuate instantaneously. There already is not capacity for this type of evacuation. Now, thousands of additional cars would make things worse, no matter how coordinated Casino employees are with our Emergency services.

Lest one think this is just a hypothetical, on September 13, 2024, the Shiloh Fire started just to the Northeast of the Casino, in the hills. Thankfully, it was a low wind day. However, the Northeast winds that frequently accompany our Fall Red Flag Warnings would have blown a fire from this location directly towards the Casino site. There would only be minutes to evacuate the Town of Windsor, the Casino, and Larkfield-Wikiup. Even the so-called “worst case scenario” in Appendix N-2 is only dealing with the pressure of evacuation times, not the real constraint in these fires: when people have to drive through walls of flames, as many did in 2017. In these situations, every second counts. We who live in this community have already experienced horrific fires and are seriously concerned about fatalities in future fires.

In a worst case scenario, if both Windsor and Larkfield-Wikiup needed to simultaneously evacuate, countless lives would be lost. One can imagine the scenes of destruction in places like Lahaina or Paradise, but the reality is these very same situations have already taken place here in Sonoma County, and will again someday.

The fire mitigation proposals are unserious, and do not take into account the likelihood of such a future fire. Adding thousands of additional people to the already bottlenecked roads, and adding additional intersections will make future fires much worse. Those who construct this casino, and those who approve the casino development would be personally responsible for the loss of lives.

Insufficient mitigation for flooding

The EIS asserts that groundwater runoff can be mitigated. As one who lives at the site of the entrance, I say this is highly doubtful. In November-December of 2024, we have already had numerous times when the existing vineyard has been completely saturated, and runoff has come up to the level of Old Redwood Highway at the Casino Main Entrance (such as on 11/21/24, seen below). A few hundred feet south, water flooded onto Old Redwood Highway.



Currently, the vineyard can absorb water, yet it already creates flooding issues for the roadway. Developing dozens of permeable acres into paved and, non-permeable surfaces will add significantly more water than Pruitt Creek can handle. This will create flooding for surrounding properties.

The EIS claims mitigation will create Less than Significant Impact on surface water resources, but the sizes of the bioswales in Sub Area A (Figure 2.1-3) are smaller than the amount of flooding that is already caused, before the site is developed with non-permeable surfaces. Much of the Hydrology is based on estimations of 500-year flood events, but there seems to be a lack of consideration for climate change. In the past three years, we have seen the record set for largest rain events in recorded history multiple times.

Driveway design problems and Inconsistencies in EIS & Appendix I

Another issue is the physical location of the Casino Main Entrance. In section 2.1.6, the driveway is described as being across from the South Entrance to Shiloh Neighborhood Church, but figure 2.1.1 shows the entrance as being across from an area mostly between two different church driveways.

Most of the time, people enter our church through the middle driveway, which is just a few feet north of the proposed Casino Main Entrance. If the casino driveway is positioned as shown in the plans, the church's entrance driveway would no longer be functional, as it would be too close to the proposed intersection. The church's south driveway that the EIS mentions is used as both an entrance and exit for church groups, but is the primary exit for some of the groups that use our facility. The casino entrance and intersection would necessitate a major overhaul in our church's parking lot driveways. Nothing in the EIS suggest how the traffic flow for the church's driveways would be addressed. **This would affect not only our church and religious groups, but the 500-700 people who receive food weekly from the Redwood Empire Food Bank in our church parking lot.** I do not see how our church could continue to host such a large food distribution with the intersection changes proposed. This is an issue of social justice.

Confusingly, Appendix I Part 1 says the driveway would be across from the church's *middle* driveway (page 167). This is inconsistent with the EIS. **The information in the EIS proper is not consistent with the relevant Appendix. This makes it impossible for me to properly respond to the actual design of the intersection that would so drastically affect our church.**

Last year, the EA also showed these same inconsistencies in the proposed location of the entrance relative to our church's entrances. It is astonishing that such a glaring mistake persisted into this round of study. The EIS is unable to provide the community with a clear description of **the main entrance to the casino**. If you are messing up describing the main entrance, what else is being missed?

In order for the church to have a fair opportunity to respond to this entrance proposal, we would need to know the actual proposed intersection design. How would it actually be positioned relative to our entrances? Would it be across from our south driveway or middle driveway? How would the plan work with our existing driveways?

As demonstrated, many of the mitigation proposals in the EIS are not well-thought out. Or, perhaps the reality is that there are not actually ways to mitigate the problems of building a casino in this location.

The EIS attempts to obscure the reality that this project is not appropriate for this location. I believe that every Native American tribe deserves a chance at self-determination, and that the Koi Nation deserves a tribal headquarters. However, this location is not conducive to large scale development of any kind. That is why the Town and County governments have designated it for agricultural land use. It is foolish to ignore the wisdom of the leaders who had made such designations.

It is outrageous that a nation of less than 100 people would need a development of this scale. Like the Koi Nation, our church is a small group of people. However, our goal is to serve our surrounding community in large ways through strategic community partnerships. In contrast, by proposing the Casino here, the Koi Nation is building a strategic partnership with developers that will harm the local community.

Those of us who live, play, work, and worship here have deep concerns that affect our every day well-being. The EIS claims its mitigation will create less than significant impact, making a mockery of the

profound anxieties and worries held by community members. The proposal of the casino has already had a profound impact on residents' mental health. How much more would an actual casino impact neighborhood well-being?

The EIS was prepared by a company not from our community. The Koi Tribe does not originate in our community. I am worried that decision-makers who are not from our community will approve this project, without seeing what this community is like. Historically, the US wronged Native Americans when US citizens did what was best for themselves without taking into account the negative effects on the people who already lived in a place. It is important to help make things right for people who have been wronged personally and in their ancestry. However, two wrongs don't make a right. Approving this project might make a better future for the members of the Koi Nation, but would surely make a worse future for everyone who lives in the Shiloh Neighborhood.

Josh Ratiani

Pastor, Shiloh Neighborhood Church

From: matt praetzel <mattp@sonic.net>
Sent: Thursday, December 19, 2024 2:00 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] my FEIS Comments on Shiloh Resort & Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Sir or Madam,

My name is Matt Praetzel, and I own a home and reside at 6194 Lockwood Drive, Windsor, CA.

Over 30 years ago I purchased a home and moved into this neighborhood adjacent to Shiloh Road and Old Redwood Hwy in Windsor, Ca.

I did this then because it was, and remains to this day, a serene, peaceful, and (relatively) quiet and low crime area where I could live contently while raising a family.

I have watched closely the advancement of the proposed Casino project, and also read the FEIS.

Obviously there are myriad potential issues addressed in the FEIS, but I don't choose to address these here, as I am certain others have done so.

But, I do want to make one point that I believe is very pertinent, but one I have not seen addressed anywhere, particularly the FEIS..

That is ..

although the myriad **issues summarized in ES-5 of FEIS** all are declared as either less than significant (LS) or potentially significant (PS) but "mitagatable",

The **cumulative effects of these issues raised are not only very significant to overall quality of life, this is not mitagatable!**

All these issues individually judged either LS or PS don't happen in a vacuum.. Because they individually are not considered significant, doesn't mean as a whole they are not significant.

Why isn't this issue being addressed?

To put this into real life scenarios, consider ..

-My added time to pull into traffic on Old Redwood Hwy (ORH) and wait for **traffic** lights at ORH and Shiloh Rd may be judged as “LS” from those who think they know, but it is definitely REAL to me!

-The rise in **crime** in the area may not be considered significant, but it undoubtably will be measurable, and therefore REAL!

-The added **noise and light** coming from the casino may be judged as “LS” but it is REAL! I will definitely hear the added clamor and traffic, and the added lights will have a small but REAL effect as well.

-The added challenge of evacuation during a **Wildfire** may not be considered Significant, but again, it is real and affects my quality of life.

-The lowered groundwater table will very likely affect my ability to draw water from my well during the late summer, when it is most needed.. again LS but REAL.

My point is that **taken together, all these issues (plus many others not mentioned) that individually are judged as “LS” add up to a very significant cost to quality of life.** to myself and those in close proximity to the Casino site.

For this point, as well as many others noted by others, I strongly urge denial of this project in its A, B, and C alternate scenarios..

Sincerely,

Matt Praetzel
6194 Lockwood Drive
Windsor, CA 95492

Yosemite National Park

Built in 1879, The Yosemite Valley Chapel is the result of the efforts of children and donations from the California State Sunday School Association helped pay for its construction. Its original location was near the base of Four Mile Trail, but in 1901 the building was moved to its present location. To contact The Yosemite Chapel - www.yosemitevalleychapel.org
Photographer - Dan Warsinger - www.yosemitephoto.com

SAN FRANCISCO CA 940

26 NOV 2024 PM 4 L



From Theresa Eaton Cotati 11/26/24
To: Dear Mr. Boussard,

Please don't allow the Skiloh Resort and Casino to pass. It is in the wrong place to build. Fire danger area, the roads are not adequate. We already have 2 casinos in sonoma County.

Copyright Dan Warsinger Photo 1-209-966-6622
Designed & Printed in The USA

Chad Boussard
ETS Bureau of Indian Affairs
2800 Cottage Way
Room W-2820
Sacramento, CA 95825
PACIFIC REGIONAL OFFICE

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95825-184699

Yosemite National Park

Built in 1879, The Yosemite Valley Chapel is the result of the efforts of children and donations from the California State Sunday School Association helped pay for its construction. Its original location was near the base of Four Mile Trail, but in 1901 the building was moved to its present location. To contact The Yosemite Chapel - www.yosemitevalleychapel.org
Photographer - Dan Warsinger - www.yosemitephoto.com

SAN FRANCISCO CA 940

26 NOV 2024 PM 3 L



Dear Ms. Dutschke,
Please do not award the Koi Nation permission to build the Skiloh resort and Casino in Santa Rosa/Windsor. It is a very unsafe area due to fires and serious ways to not get out safely. It was proven when the 2017 fire burnt down 1500 homes from Cotati, Theresa Eaton

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AMY DUTSCHKE
BUREAU OF INDIAN AFFAIRS
Regional Director
BIA Pacific Region
2800 Cottage Way
Sacramento, CA 95825

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95825-189099

WILSON FAMILY
5722 HENNING ROAD SAN FRANCISCO CA 940
SEBASTOPOL, CA 95472 10 NOV 2024 PM 5 L



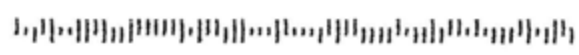
PACIFIC REGIONAL OFFICE

2024 DEC -2 AM 10:55

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

BUREAU OF INDIAN AFFAIRS

35825-189089



"FEIS Comments, Shiloh Resort and Casino Project"

Saturday, November 23, 2024

Dear Director Dutschke,

Please note NO on the Koi Resort-Casino Project. Three main reasons:

- 1) Two casinos nearby off of Hwy 101 (too many).
 - 2) Agricultural use is more healthy for residents & vineyard tax revenue for county & state.
 - 3) Nearby hills rated as a fire hazard.
- *Our entire family and all of our friends are 100% against this project. Thank you for your time.

Sincerely, The Wilson Family

DO NOT DESTROY
SONOMA COUNTY
NO KOI CASINO!

FEIS COMMENTS
SHILOH RESORT & CASINO
PROJECT

DO NOT ALLOW
INCREASED TRAFFIC
& EVACUATION HAZARDS
NO KOI CASINO!

STOP...

THE INSANITY

NO KOI CASINO!

NO CASINO IN OUR
RESIDENTIAL
NEIGHBORHOOD!

NO PROJECT...
IS THE ONLY SANE CHOICE
NO KOI CASINO!

FLAWED FEIS =
NO PROJECT
NO KOI CASINO!

PACIFIC REGIONAL OFFICE
2024 DEC 10 PM 3:02

STOP

THE RESERVATION

BUREAU OF INDIAN AFFAIRS
CASINO STOPPING

MADNESS

NO KOI CASINO

**NO... TO INCREASED
CRIME!**

NO KOI CASINO!

**WOULD YOU LIVE
NEXT DOOR TO AN
INDIAN CASINO?**





SAN FRANCISCO CA 940
 William McCormick
 5811 Faught Rd
 Santa Rosa CA 95405
 5 DEC 2024 PM 2 L



USA / FOREVER

Amy DUTSCHKE
 REGIONAL DIRECTOR
 BUREAU OF INDIAN AFFAIRS
 PACIFIC REGION
 2800 COTTAGE WAY
 SACRAMENTO, CA 95825

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FEIS COMMENTS
 SHILOH RESORT & CASINO
 PROJECT

A CASINO IN A
 RESIDENTIAL NEIGHBORHOOD
 ARE YOU SERIOUS?
 NO KOI CASINO!

PACIFIC REGIONAL OFFICE

Ashley-Renee Nye
940 Evelyn Ave
Albany, CA 94706
cribbina@gmail.com

2024 DEC 12 PM 12:11

BUREAU OF INDIAN AFFAIRS

8th December 2024

Chad Broussard

Environmental Protection specialist,
Bureau of Indian Affairs, Pacific Regional office
2800 Cottage Way, Room W2820
Sacramento, CA 95825

Dear Mr. Broussard,

I'm writing you with my concerns regarding the proposed casino project from Koi Nation near Windsor. I'm a coastal Pomo enrolled in the Lytton band with family connections to Kashia and Graton Rancheria, so this issue is personal to my community. It's unsettling that the BIA process seems to be moving so quickly to greenlight a casino in essentially the same Windsor area where my tribe struggled for over a decade to be allowed to even build houses.

To my understanding, Koi Valley's casino plan has already met significant opposition from not only the local Native community but also officials at all levels of government, including Governor Newsom. I've watched our tribal representatives fight to oppose the plan, but yet to no avail. While our tribe has worked hard to assess and lessen the environmental impact of developing our homeland community, I'm not convinced the Koi Nation plan has done likewise for their casino. It's scary to think about how a new casino from a nonlocal tribe could negatively affect the land and housing community that Lytton has spent so much time and effort developing. Many of our people are living there now and did not sign up for extra traffic, pollution and noise that would come with a big casino in this area.

Likewise, I'm also concerned about the financial ramifications for the tribes that already have gaming in the area, especially for Graton and Cloverdale. Another casino would only saturate the market and hurt the already established tribes (especially the smaller band of Cloverdale). Koi Valley should be looking closer to their ancestral homelands in Lake County instead.

As I've mentioned prior, there is a lot of overlap between families and communities in the Santa Rosa adjacent tribes. We are culturally, linguistically and personally connected and encouraged to look out for each other, even when our leaders' voices have been ignored. While I sympathize with Koi Nation's desire for financial independence, I can not support this proposal as it and strongly request both further review of environmental impact and continued conferencing with the local tribes to find a satisfactory solution.

Sincerely,



Ashley-Renee Nye

PACIFIC REGIONAL OFFICE

2024 DEC 12 AM 11:57

BUREAU OF INDIAN AFFAIRS

Teara L.F. Steele-Smith

9703 Abalone Circle
 Windsor, CA 95492
 (707)272-5545
 Teara_smith@yahoo.com

December 8, 2024

Chad Broussard
 Bureau of Indian Affairs, Pacific Regional Office
 2800 Cottage Way, Room W-2820
 Sacramento, California 95825

My name is Teara Little Fawn Steele-Smith and I am a Tribal member of Lytton Rancheria Band of Pomo Indians. Both of my parents are descendants of Lytton Rancheria. My life's mission is to support and elevate our Native community culturally and this is my standing with what Koi Nation (Lower Lake Rancheria) threatens. There is complete disregard for the voices of Native people to the proposed site; Lytton Rancheria, Dry Creek Rancheria, Cloverdale Rancheria, Graton Rancheria and Wappo Tribe to name a few. Wappo Tribe is not federally recognized, but if they were, they would not have the opportunity for economic or cultural development due to the disregard Koi Nation and it's supporters have for local Tribal communities and the community as a whole. This would also take any chances away from Cloverdale Rancheria Tribe to create economic development to support their tribal members. The Tribes will forever feel and live with the negative outcome Koi Nations Actions bring.

This is insulting and infuriating to see a Tribe from a completely separate county, a tribe that is not from here, pushing a project on our ancestral lands. They are showing they are self interested and willing to harm any local tribes in the process. What will this look like seven generations later? The other local tribes have very good relationships and work together to create a positive environment and care for the welfare of our people from here. Tribes who are still fighting to be here and stay here where we are originally from. One bad apple will cause destructive disruption and harm to an existing harmonious Native Tribal community.

This project puts our recently established homeland and everything we have fought so hard for, at risk economically, physically and culturally. Our Tribe and family has suffered immensely while fighting to return to our homelands. We have encountered well beyond dozens of deaths of elders and relatives, including our Chairwoman Margie Mejia. She lost her life after battling the fight to return us home in Windsor, California. She didn't get the chance to live on Lytton Rancherias homeland, she didn't see her family finally return home together. Along side her work to return home, she and the Tribe donated countless

funds to local tribes and our local communities when in need and not. Is this something Koi Nation (Lower Laker Rancheria) does for their local communities currently?

There has been widespread opposition from federal, state and local officials, including Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, state Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson, and U.S. Senator Alex Padilla. The Koi Nation casino project would increase, traffic, noise and crime in our community as well as the Koi Nation casino project depreciating our property values. Considering we live in one of California highest area codes for earning a livable wage and purchasing property, that would cause immeasurable harm to the county and state for years to come.

The Koi Nation casino project would cause environmental harm that will effect the surrounding area tremendously for the entirety of their presence and beyond. While the Koi Nation simultaneously claims they worry for the environment. Filing lawsuits in Lake County in fear of desecrating cultural sites and causing environmental harm. This is hypothetical. How can they accuse one of something they are doing?

The original name of the Koi Nation Tribe was Lower Lake Rancheria. The tribe changed its name in 2012. Koi translates to the, "people of water". No local tribal members in Sonoma County and Mendocino County ever hear of or knew of a Koi Nation, only Lower Lake Rancheria. It seems like a calculated name change to deflect where they are originally from. They had and denied countless opportunities to have a casino and land in Lake County, that they denied. Koi Nation wants to land shop in others tribes territory no matter the cost. It's not about what they claim as migration of their tribal members. It's about casino shopping. They have on record multiple different attempts of trying and failing to casino shop on other tribes territory and they failed. I would gladly support them building a casino for the Koi Nation In Lake County where they are from.

Koi Nation whose traditional territory includes the city of Clearlake and Lower Lake, sued in March to halt the city's projects for the 18th Avenue extension, which is related to a new hotel development. It filed another suit in July regarding the Burns Valley sports complex and recreation center project, alleging the city has not conducted state-required consultation with its local tribal government. Specifically, the tribe has pointed to AB 52, the Tribal Cultural Resources Bill of 2014, which requires that, as part of CEQA, public agencies must consult with a local Native American tribe when a project will have significant impact on tribal sites.

Thank you for considering this when making the final decision,

A handwritten signature in black ink that reads "Teara L.F. Steele-Smith". The signature is written in a cursive, flowing style with a large initial 'T'.

Teara L.F. Steele-Smith

PACIFIC REGIONAL OFFICE

December 9, 2024

2024 DEC 12 PM 12:06

Amy Dutschke, Regional Director
 Bureau of Indian Affairs, Pacific Regional Office
 2800 Cottage Way, Room W-2820
 Sacramento, CA 95825

Subject: EIS Comments, Koi Nation Shiloh Resort and Casino

Dear Regional Director Dutschke:

I am a resident that was raised and lived in the area across the street from this proposed nightmare of a casino project for 38 years . I have experienced continued increase of busyness in this area and oppose any type of casino project on this proposed property! This casino resort plan is not acceptable to our community on any level !

For starters ,this is a community with residential homes, churches, schools, recreational parks, baseball park, a rural county park with creeks and wildlife that stretch to the creek on this property and vineyard agricultural. Daily traffic and noise is already at it's maximum with more recent high density /low income and senior / memory care housing added and planned on Shiloh Road . Fire evacuation and ER services will also be even more impacted with this current increase of population. Area flooding is a current and continuous problem.

This casino project would be a negative impact on this already strained community. This project would bring an added appx 4 times the influx of traffic on Old Redwood Hwy and Shiloh Road! This traffic would undoubtedly include a population of impaired driving, crime, narcotics use, violence, narcotics sales and prostitution. The regional park which families currently use will be flooded with people using narcotics/ selling narcotics, and homeless encampments. My husband is a police officer for Rohnert Park and that is the behavior that takes place at the Graton Casino leaching out into the surrounding areas of Rohnert Park. The difference is that the Rohnert Park casino is surrounded by businesses not residential housing. All around this proposed casino are residential and low income housing. People in low income housing are struggling enough they do not need the influence of increased crime, drugs and prostitution around their families. This project would cause the existing community to experience even more difficult Emergency services, evacuation, poor air quality, more increased noise, increased area flooding and ground water depletion and contamination (many in this rural area have ground water wells). This peaceful beautiful area and community needs to be safe for my children and other families to enjoy! This area does not deserve the abuse of a casino resort project with constant in and out traffic of people that don't care about it's quality of life .

The Koi nation needs to stay in their own Lake County area for land trust plans and development. They need to at least for the respect of families stay away from residential areas. People's homes should not be surrounding a casino they did not choose this when looking for a safe place to raise their families. Sonoma County has enough casinos.

Respectfully,

Marquel Abend -Satterwhite
 2523 Sonoma ave, Santa Rosa CA 95405



PACIFIC REGIONAL OFFICE

2024 DEC 12 PM 12:07

BUREAU OF INDIAN AFFAIRS

Emanuel M. DeRouen

1461 Sea Weed Trail
Windsor, CA 95492

December 9, 2024

Chad Broussard
 Bureau of Indian Affairs, Pacific Regional Office
 2800 Cottage Way, Room W-2820
 Sacramento, California 95825

My Name is Emanuel and I am a Tribal Member of Lytton Rancheria Band of Pomo Indians. My grandmother was born on my Tribes original land assignment that was illegally taken from us, and this year she was able to return to our homeland. Well over seventy years later. This was how long my Tribe and family has fought and waited to return home and now it's threatened to be disrupted after not even living here for a year. How is this fair? It feels like salt on a very deep wound.

There is complete disregard for the Indigenous peoples to the proposed site. There are several federally recognized Tribes and a few that are still fighting to gain federal recognition that rightfully belong and originate from this territory. Why makes so many other Tribes battle lifetimes and let Koi Nation Slide right through the cracks, Taking away any fighting chance other local Tribes might have?
 I have included a few local Tribes that are singlehandedly from the territory and who will suffer with this passing.

Lytton Rancheria
 Dry Creek Rancheria
 Cloverdale Rancheria
 Graton Rancheria
 Wappo Tribe

If this passes Wappo Tribe who isn't currently federally recognized would never get the opportunity for economic development because Koi Nation doesn't care who it harms in this process. Koi Nation has proven they don't care for the welfare of Native community in Sonoma County where they plan to reside or the non-native residents. Koi Nation is a Tribe from a completely separate county, meaning they are not from here. They are pushing a project on our ancestral lands, they are not hiding their self interested agenda. They are willing to harm any entity weather it be local business owners, land owners, or neighboring winery owners, and local tribes in the process. My fear is what this will look like in the years to come.

This project puts our recently established homeland and everything we have fought so hard for at risk, economically and physically. It's unfair and unjust that we have had to suffer this much and for this many generations all to have a chance to lose it so soon. My auntie, the late Chairwoman Margie Mejia fought to return us to our homeland and she never got to see her family and Tribe finally live together once again. She dedicated her life to make this dream a reality and to think it can so easily be changed is devastating.

I had never heard of Koi Nation before they purchased the Windsor property. I knew of them from their previous name, Lower Lake Rancheria. Koi Nation's traditional territory includes the city of Clearlake and Lower Lake. I know they are fighting to claim rights on other Native Tribes' territory in Sonoma County while at the same time filing multiple lawsuits in Lake County; Specifically, the Koi Nation has pointed to AB 52, the Tribal Cultural Resources Bill of 2014, which requires that, as part of CEQA, public agencies must consult with a local Native American Tribe when a project will have significant impact on tribal sites. Koi Nation filed another lawsuit in July regarding the Burns Valley sports complex and recreation center project, alleging the city has not conducted state-required consultation with its local tribal government. It doesn't make sense why they are claiming rights in two totally separate counties. One well beyond their ancestral home.

If every Tribe across the Nation did this, what would the future of Indian County look like?

Thank you for your time,

Emanuel M. DeRouen

December 9, 2024

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

PACIFIC REGIONAL OFFICE

2024 DEC 12 PM 12:03

BUREAU OF INDIAN AFFAIRS

FEIS Comments, Shiloh Casino Resort

The final Environmental Impact Statement has no substantive change since the last version. None of the serious environmental concerns have been addressed or researched. The location of this proposed project is completely wrong on every environmental level. Apparently, neither the BIA nor the Department of the Interior cares about the environmental impact on the land or the existing community of people or wildlife living here. You only care about money.

It seems clear to those of us who have followed all these bogus environmental reports that there was never any intention of substantively addressing any of these issues. This project has already been bought and sold, many palms greased, by the Chickasaw Nation, the largest Indian Gaming Cartel in the USA. This project will be rammed down the communities throat no matter what serious issues exist. Neither the Koi Nation nor the Chickasaw nation give a darn about this community. They just want to prey on the worst addictions of humanity to make money. They do not care where they do it. They are willing to plop this hideous project in the middle of a residential community historically prone to urban wildfire. They do not care about all the air pollution from 20,000 additional car, bus and truck trips that will fill the air. They do not care about the unlicensed sewage system that will be trucking out all the effluent every day through residential streets. They do not care about stealing this land from the actual native tribes already here. They do not care about all the trees, birds, coyotes, deer, bobcat, skunks or water systems this will destroy.

Neither the Koi nor their pimps, the Chickasaw Nation, have EVER once reached out to us, the residents 40 feet away. But we know they have been "lobbying" senators, congress persons, and all of you in the BIA and the department of the interior to get what they want. When we FOIA this after you rubberstamp this project, we will expose all of your corruption. It will be the beginning of public sentiment turning against native American tribal gaming. And it will be your fault. Innocent tribes who have followed the rules and worked with their communities will suffer too. Shame on all of you.



Lynda Williams
5801 Mathilde Drive
Windsor, CA

August 6, 2024

PACIFIC REGIONAL OFFICE

2024 DEC 12 PM 12: 10

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

Subject: EIS Comments, Koi Nation Shiloh Resort and Casino

Dear Regional Director Dutschke,

I am a Tribal Citizen of the Federated Indians of Graton Rancheria and the purpose of this letter is to express my opposition to the Koi Nation of Northern California's project to establish trust land for gaming in Sonoma County, California.

The Koi Nation, previously known as the Lower Lake Rancheria, submitted a restored lands gaming application to the U.S. Department of the Interior (DOI) for a parcel located outside the Town of Windsor, in Sonoma County. The proposed project location is over a 50-mile drive from the Koi Nation's ancestral and cultural roots in the Lower Lake area of Lake County, where its historic rancheria was located.

DOI is supposed to protect tribal sovereignty and this precedent setting proposal by the Koi Nation is actually *undoing* tribal sovereignty. DOI is now being put in the position of pitting Indians against Indians here in California. Our tribes were not removed from their ancestral homelands, like tribes in Oklahoma. In California, tribes were not removed, but were decimated in place. As my Tribe and others rebuild, our Tribal Citizens are returning to their ancestral territories.

DOI must consider an alternative location for the Koi Nation in their true homeland in Lake County. DOI would be wrong to allow for Koi Nation to jump into another tribe's territory by trying to demonstrate a significant historical connection to our Southern Pomo territory based on trade routes or one family moving to our territory. Koi Nation's application is simply a new twist on their previous efforts to acquire gaming sites *outside* of their ancestral territory, which DOI was correct to deny on the same grounds.

I support the right of all tribes to restore their homelands and pursue gaming on those lands. I cannot, however, support this project. It undermines tribal sovereignty and would be to the detriment of the identity, sovereignty, and cultural rights of the federally recognized tribes in Sonoma County.

I would greatly appreciate you considering another location for the Koi Nation casino in their ancestral territory in Lake County. Otherwise, this project should be denied.

Respectfully,



Janelle Ashley Montgomery
3146 North Canyon Road
Camino, CA 95709

4794 Hillsboro Circle
Santa Rosa, CA 95405

PACIFIC REGIONAL OFFICE

2024 DEC 13 AM 11:35

BUREAU OF INDIAN AFFAIRS

December 10, 2024

Bureau of Indian Affairs
Chad Broussard, Environmental Protection Specialist
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

Dear Mr. Broussard,

I am writing in opposition to the KOI nation's proposed casino in Windsor. I live in Santa Rosa, which is the home of the Pomo Indians. I oppose it for many reasons.

First, the proposed casino would take Pomo land and cede it to the KOI nation, who lived in Lake County, far from this place. I am a pastor and wrote a sermon on the cruelty Californians inflicted on indigenous peoples, for which we need to atone. I wrote:

In the 1850's California's Governor Burnett tried but failed to pass laws banning black people from our state (as he did in Oregon), but was successful in dominating California's indigenous people. Burnett signed a law that enabled whites to force Native people from their lands into indentured servitude. He set aside state money to arm local militias against Natives and, with the help of the U.S. Army, distributed weapons to the militias, who were tasked with raiding tribal outposts and scalping and killing Native people. This they did in the 1850 "Bloody Island Massacre" of Pomo men, women, children at Clear Lake.

The KOI nation is the group of Pomo's who occupied this settlement, which is in Lake County, not Sonoma County.

Second, I object because the local Pomo and Dry Creek tribes were not included formally in the review of this land grab, as they should have been. The casino is competitive with two existing casinos and threatens their ability to care for their own tribal members.

Third, the casino will bring unwanted, dangerous traffic to a residential and agricultural area with no regard for its neighbors whose adjacent homes will no longer be their "castles," but will suffer with heavy traffic, air pollution, light pollution, and noise. There is no way that this project can exist without endangering wildlife such as native birds, bees and butterflies that inhabit this agricultural property.

Last, because of rigorous review, the state Legislature and legislators from our local city councils, our board of supervisors, our state senator, our federal congressman and now all the way on up to the governor oppose this casino.

Ceding this land to the KOI nation would be a tragedy and travesty of justice for indigenous Pomo and Dry Creek Indians.

Sincerely,

A handwritten signature in blue ink that reads "Gail Cafferata". The signature is written in a cursive, flowing style.

The Rev. Gail Cafferata, Ph.D.

EIS Comments, Koi Nation Shiloh Resort and Casino - Windsor, Ca.

PACIFIC REGIONAL OFFICE

2024 DEC 16 PM 2:16

BUREAU OF INDIAN AFFAIRS

Dear Amy:

I'm writing to let you know my thoughts (as well as other locals here) regarding the proposed casino project planned here in Windsor, California. Those of us who live here have many concerns regarding this project: the detrimental impact on the environment - which, at the moment, is a large, beautiful vineyard; the burden this will place on our already scarce water supply and available electricity; the massive contribution to heavy traffic now associated with new multi-unit apartments being built nearby; the impact of higher crime in the area associated with gambling and liquor.

I've lived in Windsor for over 35 years. It's always been a peaceful, beautiful town with open spaces, vineyards, bike paths and parks. In the last few years we've seen rapid growth: apartment units; low-income housing projects; a hotel; a cement factory; a senior memory center complex. This giant casino - placed in the middle of what is now a large vineyard, surrounded by residential homes - will completely ruin Windsor. We certainly don't need another casino in Sonoma County - there are already two others within 8 miles of this proposed site.

I implore you to consider the feelings of the people who have made Windsor their home.

Thank you for your time!

Sincerely,



Jon Bernal
228 Maili Court
Windsor, Ca. 95492

From: Anne Gray <annegray123@sbcglobal.net>
Sent: Thursday, December 19, 2024 3:09 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

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Dear Chad,

I was very disappointed reading the last effort to assess the impact the Koi Nation project will have on Sonoma County. And disappointed that it appears the consulting firm who has done all these reviews has also done work for the Koi Nation as that seems like a clear conflict of interest to me. Certainly a different firm could have been used so this apparent conflict would not materialize.

Attached is another letter of opposition. I also find it sad that you would give the public only until December 23rd to reply as this time of year is hectic for most. I request a delay in your deadline.

Please keep me updated as the initiative moves forward.

Sincerely,

Anne Gray
Santa Rosa, CA

Anne Gray
Santa Rosa, CA

December 19, 2024

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

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

Dear Regional Director Dutschke:

I continue to oppose the Koi Nation (and by default Chickasaw Nation) FEE-TO-TRUST unincorporated land transfer so the Chickasaw Nation can **fund, build and manage** what would probably be the largest casino/resort in California, just down the road from another mega casino, Graton Casino, using the tiny 89 member Koi Nation tribe for access to our county.

The Final Environmental Impact Statement (FEIS) from November 22, 2024 still does not adequately address the impact this project would have on the local community, and Sonoma County. I have written several other times outlining the flaws of the “independent” studies but nonetheless each subsequent revision remains full of faults and erroneous conclusions. Please listen to the people who live and work here. Please visit our community and the proposed site. If you do, you will see why this project should not be approved.

In previous letters to your office I have raised concerns regarding wildfire risks, traffic and safety, neighborhood security, the closeness of senior only housing facilities and the fact that Sonoma County is not where the Koi Nation has ancestral roots. Those exist only in Lake County. Moreover, legitimate Sonoma County tribes have voiced opposition to this project many times, but it falls on deaf ears.

Please understand that this project would result in severe harm to Sonoma County and its residents. Do not approve this project. The “No Project” option that should receive BIA approval.

Sincerely,

Anne Gray

Anne Gray
459 Country Club Drive
Santa Rosa, CA 95401

From: Don Gates <don@eastbaytcm.com>
Sent: Thursday, December 19, 2024 2:43 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard,

My wife and I moved from Oakland to Windsor two years ago precisely because of the small-town vibe, clean air and water, slow pace of life, and relative freedom from the chaos of big crowds and noise/light pollution. Our home's closest freeway exit is the same Shiloh Rd that the proposed Koi Nation casino will be using. Our home lies just three miles west of the proposed casino site, and for that reason and others, we are deeply opposed to the project.

As we understand it, all of the *actually* local Native American tribal groups are opposed to the project as well, and we stand in respectful solidarity with them. For us, personally, the fear of crowding and congestion on our local roads is a major concern, particularly during an emergency evacuation. We also fear the depletion and contamination of local water supplies, increase in air pollution from traffic congestion, increases in light and noise pollution, increases in opportunistic crime drawn in with gambling, etc etc. We can't think of a single good reason to site such a large gaming casino in this quiet community.

We absolutely urge that the proposed casino project be rejected and the Windsor area be protected from any such opportunistic outside development.

Respectfully,
Don Gates and Tamar Cohen
6364 Starr Rd, Windsor, CA 95492-9653

From: Larry <lsantarosa@aol.com>
Sent: Thursday, December 19, 2024 3:28 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Attack

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello Mr. Broussard: I am against this proposal, which most here consider an attack. By a tribe that went casino shopping and ended up in a pastoral area north of Santa Rosa. You may have visited the area, or may be too busy to come to Sonoma county to see for yourself. This mega-resort would be competing with and taking gamblers away from River Rock casino, a 10-15 min. to the north. River Rock has been struggling since it was built (despite a community out-cry), and even though bus-loads of \$\$seekers are dropped off there each day, its bond-holders have been left hanging, missed dividends, low credit-rating.

The highly successful Graton Resort and Casino was a death blow to this casino ten yrs. ago (SEARCH: river rock casino bond-holders).

The changes in this area of single-family homes and ranches if this proposal is approved will be irrevocable, regardless of how well or poorly this Koi casino does.

It's a big middle finger in our community's face, and every Sonoma county official, members of the Senate & state Assembly, the Press Democrat: all totally opposed.

If you haven't visited the site, drop by before making your decision, you'll see the gem Shiloh Ranch park and trails less than a half-mile away, and a liveable mix of sub-division homes and ranches.

**thanks for listening,
Larry Scharf**

From: Marie Scherf <mscherf@bpm.com>
Sent: Thursday, December 19, 2024 5:00 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino

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Dear Chad:

Thank you for allowing additional comments re: the proposed casino in Windsor.

It's difficult for me to understand how this project has gotten to this point. I have several major problems with it:

1. My house almost burned down in the 2017 Tubbs Fire and we were evacuated during the 2019 Kincaid Fire. The roads in my area were clogged with vehicles trying to get out of the area and ours are more developed than those near the proposed casino. Unless major improvements are done to those roads, I can't imagine how the occupants could possibly evacuate safely in case of another fire. And major changes to those roads would be an unwelcome change to the beauty of that area.
2. Droughts are prevalent in Sonoma County and water is a constant concern. The idea of a large casino taking so much of our local water resources is abhorrent to me. We all must conserve in hopes that we have enough during droughts which can be long term and pretty severe. That anyone would approve of a project like this in Sonoma County is very selfish, short-sighted, and greedy. There has been much local high-density development in our area recently, which benefits our community at large, and will already put a strain on our water supply. How can this fact be ignored by the BIA?
3. Our local elected officials know our County and have our best interests in mind. They all oppose this project and their views should be respected as our representatives. This includes our governor. So why can the BIA choose to ignore them?
4. Our family and neighbors enjoy our local park in Shiloh and energetically support it. The fact that this casino will impact the area negatively with noise, pollution, traffic, and crime creates long-term harm to our community.
5. It is an absurd notion that the Koi Nation would be allowed to develop property in Sonoma County, which is not their aboriginal territory. Local tribes with strong roots to this community deserve better treatment and recognition from the BIA.

Marie Scherf
745 Jean Marie Drive
Santa Rosa, CA 95403
(707) 365-0011

NEW

TAX

LAWS

There have been many recent tax law changes. For more information about these new tax laws, please visit our website at www.bpm.com

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From: Bill Bolster <billbolster@eoc-inc.com>
Sent: Thursday, December 19, 2024 6:07 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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My wife and I have lived at 6500 Faught Rd., Santa Rosa, CA since September, 1977 (47 years).

Here are our objections to the Koi Nation Shiloh Resort and Casino:

1. This development will have a significant impact on traffic on all the surrounding roads. People avoiding the congestion will spill onto our narrow winding country road (Faught Rd.). It is not designed for that.
2. Fire danger. This development is in the path of the last 2 fires, Tubbs and Kinkade. The vineyard is supposed to be a fire break. The development will be fuel for the next big fire.
3. We live in the country and have 2 wells on our property. Until the drought, we had no problems. In the last 5 years one well went dry, and the 2nd is marginal. We do not irrigate our landscaping anymore and keep our fountain dry. If the Koi Nation builds the development, they will draw down the water table more. I had to drill an expensive deep well. The very least they should do is to get their water from the Town of Windsor or the County of Sonoma so that they live with the same rules others do. There is a freeze on new wells for everyone in Sonoma County. This should apply to the Koi Nation too.
4. This location is not near the Koi Nation's home. That is 48 miles away in Lake County. No other tribe has built a development farther than 15 miles from their home. This is a terrible precedent to set.
5. Sam Salmon, former mayor of Windsor and now on the town council, suggested that the suitable land for this development was on the vacant land south of Home Depot on the south side of Shiloh Rd. Easy access, wide road and just off Hwy 101. Not this location far from the freeway and through residential development.

Do not let this development proceed. There are too many issues with the impact of it. Again, a terrible precedent to set.

William and Joan Bolster
6500 Faught Rd., Santa Rosa, CA 95403
707-843-6453
billbolster@gmail.com

From: Lynn Caruso <lynn.caruso4@gmail.com>
Sent: Thursday, December 19, 2024 7:28 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, 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,

Thank you for the opportunity to comment on the above project.

My husband Ron and I have lived in Cloverdale, approximately 22 miles to the project's north, for more than 18 years.

For the last year, we have discussed moving closer to Santa Rosa, specifically to Windsor. Should this project be approved in its present form, we'd have serious concerns about moving there.

The size of the Shiloh resort's structure including the number of hotel rooms and gaming floor size far outstrips the ability of local infrastructure to handle it. The influx and egress of patrons would greatly impact roads, to say nothing of the surrounding community.

Sadly often crime increases when casinos are built. The City of Windsor is contracted with the Sonoma County's Sheriff's Office for coverage currently. How they will expand their services to cope with added demands and keep up with current needs is a big concern.

Living in the West, water and fire worries are ever with us. Both would be major factors should the proposal go forward.

The last major evacuation for a fire in Windsor basically resulted in a parking lot on our main highway, 101. It could only worsen should all the additional patrons be added to the roads. Windsor's main water supply is Lake Sonoma. Although the last two years have been good water years, the pattern of rainfall over the years we've lived here has not been so abundant. Designing to conserve in a resort setting is hard to achieve.

As housing costs have skyrocketed in this area, the commute zone keeps growing. People have always commuted from Cloverdale south, but I've seen a lot of added traffic from our north going south everyday, including from Mendocino and Lake Counties. This promises to only increase in the future. Again, increased daily traffic to the resort will have an impact.

Thanks again for the opportunity to comment.

Sincerely, Lynn Caruso
Cloverdale, CA

From: Barbara <bcoen@sonic.net>
Sent: Friday, December 20, 2024 5:21 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] koi Nation Casino/Windsor

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Chad,

I am on record, and want to reiterate my strong opposition to the above project.

I serve on the Board of Directors of the Wikiup Greens HOA and we all feel the project poses many threats to our community and all the surrounding areas.

Please SAY NO.

Thank you,
Barbara Coen
411 B Las Casitas
Santa Rosa

From: Carlos Longoria <Carlos.Longoria@riverrockcasino.com>
Sent: Friday, December 20, 2024 6:58 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] OPPOSE PROPOSED KOI NATION CASINO IN WINDSOR

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Chad Broussard,

Being from a tribe that is indigenous to the proposed site I would like to share with you my concerns about the KOI nation casino in Windsor,

My key concerns are There has been complete disregard for the voices of native peoples indigenous to the proposed site.

It is insulting and infuriating to see a Tribe from a completely separate county, a tribe that is not from here, push a project on our ancestral lands.

This project puts our recently established homeland and everything we have fought so hard for, at risk economically and physically.

There has been widespread opposition from federal, state, and local elected officials, including Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, state Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson, and U.S. Senator Alex Padilla.

The Koi Nation casino project would increase, traffic, noise, and crime in our community.

The Koi Nation casino project would depreciate our property values.

The Koi Nation casino project would cause environmental harm

Carlos Longoria
Facilities Manager

3250 Highway 128 E.
Geyserville, Ca. 95441
C: 707-385-3027
D: 707-857-2738
carlos.longoria@riverrockcasino.com

From: Lonnie Schick <lonnieschick@hotmail.com>
Sent: Friday, December 20, 2024 7:01 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Drive Faught Road!

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Mr. Broussard,

I live at 590 Pleasant Ave. and my property borders Faught Road which is also the same road that borders the proposed Koi Nation casino project in Santa Rosa, California. Every day I drive along this narrow road. It is so narrow and windy that you have to slow down when another car passes you in the opposite direction. This is one of only two outlets other than Shiloh Road that would allow access to the proposed casino. I encourage you to drive this road before a decision is made on this project.

If you were going to allow this project to go forward all the roads leading to the casino need to be widened. At the end of this road is Mattie Washburn Elementary that schools K-2 grades. Twice a day, every school day, Pleasant Ave connecting Faught Road, becomes a parking lot as parents pick up their kids, and does not allow access to Old Redwood Highway. Traffic and patrons of the casino would never know this. The cost of this project would not be economically feasible. I therefore encourage you to vote no on this casino project by the Koi Nation.

Thank you,

Lonnie Schick
707-775-7227
Sent from my iPhone

From: John Torres <jonniet@comcast.net>
Sent: Friday, December 20, 2024 7:30 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] No to Kio Nation Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Greetings, I would like to voice my opinion of "no" to the casino project by the Koi Nation near Windsor. The Koi Nation has no aboriginal territory here in this part of Sonoma County. I believe they will do environmental harm, including, increased traffic, noise, and crime. There was no consultations with the impacted tribes of this area in Sonoma County. The land is far from Koi Nation aboriginal territory. I agree with federal, state and local officials who are against this project. Please say "no" to the Koi Nation casino. - John I Torres, 76 Devon Ct. Santa Rosa, CA 95403
Sent from my iPhone

From: Arlene Knudsen <arleneknu@aol.com>
Sent: Friday, December 20, 2024 7:58 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Casino project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Please DON'T put the casino in this residential area. The streets are narrow. The traffic would be terrible. Casino locations should not have a negative impact on the area where many children and seniors live.
Sent from my iPhone

From: Susan <smedischler@comcast.net>
Sent: Friday, December 20, 2024 8:17 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Yet another casino???

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Dear Mr. Broussard,

I write to express my grave concerns about the possibility of yet another casino being allowed, here in Sonoma County, CA.

If no other considerations were to be had, just look at what has happened to Rohnert Park, CA after Graton Casino & Resort was built. I have friends who live right around there, and ALL of them have told me about major increases in crime in their area. Everything from mail theft, to porch thieves, yard thieves, mail thieves, to car break-ins and worse.

Property values have declined around the casino area in Rohnert Park.

Traffic is, of course, already a real problem on Old Redwood Hwy, especially during 'crush hour'. It is single lane in both directions for much of it. How do they plan on dealing with that? Taking out peoples homes and businesses to widen the roadway?

We already have two casinos in this count. We already have HUGE traffic and crime problems. Many of which can be attributed to the casinos we already have! Why on earth would a third casino even be considered, must less allowed, in an area that is already impacted by two too many casinos?!?

Please don't allow more blight, crime and traffic on our already overburdened county and it's residents. It's not even a sensible idea to anyone, perhaps, but the Koi Nation-who has NO LAND anywhere near that area.

Sincerely,

Susan Dischler

From: Norman Vachon <normanvachon0@gmail.com>
Sent: Friday, December 20, 2024 8:17 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Against a casino in Windsor, CA

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

As a Windsor resident I am against the construction of a casino in our town. Windsor is appreciated for its small town charm, safety, and being a bedroom community.
There are two casinos in nearby towns. ANOTHER CASINO IS NOT NEEDED OR WANTED.
Thank you,
Norman Vachon

From: Brenda Smith <bsmth44@gmail.com>
Sent: Friday, December 20, 2024 8:32 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] No Vote- KOI Nation Casino Project, Windsor, CA

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Hello,

My name is Brenda Smith and I want my voice to be heard as an "opponent" to the KOI Nation Casino Project.

I am a Sonoma County resident and a recently retired teacher of over 20 years. I chose Sonoma County as my place to retire based on locality of places to hike, camp, relax. The county is made up of 30% seniors, myself as one of them who live here to appreciate all that Sonoma County offers.

In addition, I have purchased my first Regional Park Pass for 2025. I ride my bike 4-5 times a week to support the lowering of my carbon footprint as well as increase mobility and exercise. I live here with intention.

Adding another Casino to Sonoma County is not acceptable for the following reasons:

Increased traffic, noise, crime

Depreciation of property values

Environmental Harm

No consultation with impacted tribes

Land that is far from Koi Nation's aboriginal territory

Widespread opposition from federal, state, and local elected officials

I appreciate you noting my "NO Vote" to the Koi Nation Casino Project.

Thank you,
Brenda Smith

From: John Lilienthal <lilienthaljohn@gmail.com>
Sent: Friday, December 20, 2024 6:40 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Please Reject Koi Casino

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Sir

As a Windsor resident, I am very concerned about this project. Its location is terrible and would great impact city streets and I fear drop the value of my property. Please do not approve this project.

Best
John Lilienthal

From: David Brown <DBrown@adobeinc.com>
Sent: Friday, December 20, 2024 8:38 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] KOI Nation Casino Hotel

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I wanted to reach out and state my support for the Koi Nations' proposed Casino in Sonoma County, California. This project will bring much needed good paying jobs and enhance the hospitality industry in this beautiful part of California with so much to offer. The opposition brings up points that I do not believe either are true or are meaningful. Please move swiftly forward with an approval of this project that will help the KOI Nation and other tribes in northern California.

David R. Brown,

From: Suzanne Calloway <suzicalloway@gmail.com>
Sent: Friday, December 20, 2024 9:15 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Koi Nation Shiloh Resort and Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard:

I am an elementary school teacher at San Miguel School on Faught Road, which is less than a mile from the proposed Koi Nation casino. I am also a local resident - I have lived at my home on Coachlight Place, in the Larkfield/Wikiup neighborhood that borders the proposed casino, since 2002. I strongly oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project. The Final Environmental Impact Statement (FEIS) released on November 22, 2024, much like the earlier draft environmental impact statement (DEIS), continues to fail to adequately address the significant and far-reaching impacts this project will have on the surrounding community and Sonoma County as a whole.

The Bureau of Indian Affairs (BIA) is not listening to the concerns of the community. The promise to consider public comments has not been met. It is evident in the FEIS that my previous comments in the 3 letters I have sent have not been addressed.

The most glaring one being **the traffic analysis still DOES NOT include Shiloh Road and Faught Road, Airport Boulevard and Faught Road, and Airport Boulevard and Old Redwood Highway, all of which will be routes used to access the proposed casino.** Other streets and intersections *across the freeway* were included BUT NOT THESE ADJACENT ROADS!

Faught Road will be a shortcut to the casino, with thousands of cars passing through a quiet street all day and night, right in front of an elementary school where neighborhood kids walk and bike to school. This neighborhood is out of city limits and not patrolled by SRPD - traffic issues are dealt with through the California Highway Patrol and it is not easy to ever get any kind of response from them in a timely manner due to the scope of the area they cover.

Furthermore, having lived through the Tubbs fire and the Kincadee fire, evacuation is absolutely a life and death situation. The fire came directly behind our street, in direct line to the proposed casino property. We barely escaped. The local

roads were clogged even with only the residents of this little area. Then in 2019 (Kincade), although we had more warning, the freeway was still gridlocked for hours! And the question isn't IF we will have another wildfire, it is WHEN. Another huge factor would be the implications of a daytime evacuation, much like the Paradise Fire. San Miguel Elementary is part of the Mark West Union School District and our district has ZERO home to school transportation/buses. As a charter school, we accept students from all over the area - especially from Windsor. The amount of traffic that would be coming IN to the area in the event of an emergency would be thwarted by the thousands of additional people at the casino trying to leave. People will die during the next fire with the addition of this project.

Again, this was not addressed in the FEIS study. There is no part of the evacuation plan that encompasses Faught Road, which is two lanes. As such, the FEIS does not answer the questions brought forth by the community.

As I mentioned above, we are not in the city limits of Windsor OR Santa Rosa. We are covered by the sheriff's department, not Santa Rosa PD, so law enforcement emergencies take an inordinate amount of time to get a response. The increased crime that will accompany this type of business will go unchecked - the casino security may police *their* parking lots but what happens when nefarious activities then move to Shiloh Park and San Miguel School? We can't get a sheriff to regularly patrol when we have had incidents now, so what will happen then?

The FEIS states they will “negotiate with police and fire departments” with no clear definition of what that will look like. Again, the FEIS does not answer the questions brought forth by the community.

In summary, between the roads and resulting fire evacuation impossibilities, the proximity to an elementary school, and the lack of infrastructure in our unincorporated area, a project like this at this location would be a disaster. The mitigations suggested by the FEIS report remain vague and incomplete. Therefore I oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project.

Sincerely,
Suzanne Calloway
531 Coachlight Place
Larkfield/Wikiup

From: ANDY ADAMS <1blubugg@comcast.net>
Sent: Friday, December 20, 2024 9:37 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Windsor casino

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i live in windsor been here 35yrs or more but i just wanted to let you know we do not need a casino here and most of all not in that area there is alot of building going on in that area and when it's done the traffic is going to be a mess and that would make it worse so i vote to keep it out send the tribe back to lake county. Thank you andrew adams

From: Laurie Leach <laurieleach@comcast.net>
Sent: Friday, December 20, 2024 9:50 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Hello Mr. Broussard,

We have been invited, once again, to provide input on the Shiloh Resort Project. Since it appears this project has already been approved, I don't understand the point. However, given the hideous nature of this project, here I am.

This project is inappropriate for many reasons including:

This tribe is not from Sonoma County. This alone should be disqualifying.
This resort will drain the groundwater from this area. We just survived major drought.
The area is fire prone. Evacuation 2x in recent years. Add 5,000 people?
Road access from freeway is narrow and congested already. Tribe stated they won't widen roads.
There are 300 new apartments under construction on Shiloh already. Did you even consider this? These projects gave inadequate parking so we are looking at parking Armageddon already.
The resort will destroy established homes right across the street.

I hope Greg Sarris and his tribe can effectively fight this in court. Your department apparently cannot see these obvious issues. I am incredibly disappointed. Not that you care.

Laurie Leach
219 Deanna Place
Windsor, CA 95492

Sent from my iPad

From: judithcramer@rocketmail.com <judithcramer@rocketmail.com>

Sent: Friday, December 20, 2024 10:20 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I would like to voice my opposition to the proposed casino on Shiloh Road, Windsor. Along with the traffic concerns and the inappropriate scale for a rural area, it would be an economic disaster for the area. There are already two casinos in the vicinity. Both are successfully, employing, locals, and contributing to the community.

This casino would endanger one or both of them to go out of business. So approving this project would be reckless for the community.

Sincerely
Judy Cramer

[Sent from Yahoo Mail for iPhone](#)

From: Robin Hartmann <avocadospice@comcast.net>
Sent: Friday, December 20, 2024 10:28 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] KOI Nation proposed casino

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Mr. Broussard,

I am writing to oppose the proposed casino in Windsor, California by the Koi Nation, whose ancestral land is roughly 60 miles and a mountain away from Windsor.

I live six miles from the proposed site and am very concerned with the environmental harm that may occur if the casino goes forward. I am particularly concerned about the harm to the view shed from the nearby Shiloh Regional Park. I am also concerned that the park will receive an unmanageable increase in visitors from casino patrons, resulting in crowded roads, trails and parking.

The Windsor area has suffered from several wild fires in the last decade. In case of an emergency evacuation due to fire, the large number of people trying to evacuate from the casino would be hampered due to the large increase of cars trying to access local roads and the freeway, most of them unfamiliar with the area, causing the possibility of panic and gridlock.

Sonoma County has suffered from drought in the recent past and we fully expect to experience it again due to global warming. The increased use of water that would be needed by the resort takes water from the local residents.

The project is strongly opposed by federal, state and local elected officials, as well as local tribes, in whose ancestral land the project actually sits.

For these reasons, I am urging you to reject this project.

Respectfully,
Robin Hartmann
1517 Beaver St.
Santa Rosa, CA
95404

From: Ken and Terry Marshall <kenandterrym@sbcglobal.net>
Sent: Friday, December 20, 2024 11:53 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] "FEIS Comments, Shiloh Resort and Casino Project"

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A casino in the middle of a residential neighborhood is a bad idea. It should be located in a commercial district.

Old Redwood Highway is a two lane road and is already overwhelmed during school hours and commute hours. The volume of traffic a casino would bring would be a nightmare.

Highway 101 Shiloh entry/exit floods when it rains.

Gambling will bring a huge rise in criminal activity to our small town. Criminal activity means our residents will be victims and our police force overloaded.

Property values will drop.

The casino benefits no one in Windsor.

For those who want to gamble, there are two already in existence and in non-residential areas. Both the casino to the north and the casino to the south are less than 20 miles from Windsor.

I beg you to not grant the casino in our town.

Sincerely,

Terry Marshall
9554 Vancouver Lane
Windsor, CA 95492

kenandterrym@sbcglobal.net

From: Steve Foster <foster.911@sbcglobal.net>
Sent: Friday, December 20, 2024 12:03 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] KOI NATION CASINO PROJECT

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Mr Broussard,

I understand that you are reviewing an application for a CASINO near Windsor, California by the KOI NATION.

My position is that I am AGAINST any approval of this application for the following reasons:

- I live about 2 miles from the proposed site of the CASINO in a Sonoma County residential neighborhood and 1 block off Old Redwood Highway, which is a 2 lane road that runs all the way to the proposed CASINO site and beyond to Windsor. The proposed site is surrounded on 3 sides by residential neighborhoods, a public park and an apartment/condo complexes. There are no other commercial buildings near the proposed site.
- This location would generate more traffic, noise, and crime near me as gambling attracts more people out of the local area and many of those have criminal intent.
- This location would depreciate the value of any residential property near it.
- This location backs up to a beautiful rolling hills area that could be harmed by environmental pollution from this large CASINO project.
- The land selected by this KOI NATION Tribe is far from their aboriginal territory, which I believe is in Lake County.
- The KOI NATION did not bother to consult with neighboring impacted tribes. They are the River Rock Casino in Geyserville, CA that is 15 miles north of my location and run by Dry Creek Rancheria Band of the Pomo Indians. Another one is the Graton Resort & Casino in Rohnert Park, CA that is 10 miles south of my location that is run by the Coast Miwok and Southern Pomo Indian tribes. There is also the Lytton Band of Pomo Indians based in Sonoma County that was also not consulted.
- With the 2 Casinos noted above within 25 miles of each other, we are already saturated with Indian Casinos. Adding another Casino in Sonoma County would be too many Casinos to divide up the clientele who frequent these establishments.
- There is widespread opposition to the KOI NATION project near Windsor from federal, state, and local elected officials because the general population of

Sonoma County is against it as I have seen public comments in the local newspaper and public demonstrations against it.

Please take these issues seriously and deny the application for another CASINO in Sonoma County by the KOI NATION.

Thank you for listening.

Charles S Foster
Homeowner
9 Voss Park Circle
Santa Rosa, CA 95403

From: Carl Euphrat <ceuphrat@sonic.net>
Sent: Friday, December 20, 2024 12:39 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Mr. Broussard-

Please find attached my comments on the FEIS for the subject project.
Thank you.

Carl Euphrat

December 14, 2024

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

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

Dear Ms. Dutschke,

I have lived in Sonoma County for the last 35 years and in Windsor for the last 30 years. As a resident of Sonoma County, and the Town of Windsor, I am strongly opposed to the fee-to-trust application of the Koi Nation for purposes of developing a hotel and casino. It is not that I oppose a tribal gaming facility, we already have a few in Sonoma County. I am opposed to this particular location as a gaming facility. The proper location for any resort and gaming facility is land already zoned for such a use. The Sonoma County Zoning designation on this land is Land Intensive Agriculture. "Agriculture" being the operative word. Many surrounding parcels also have the same designation. A hotel and gaming facility runs 180° in terms of use for this land. A hotel and gaming facility should be located on land designated for business, hospitality or industrial use.

Both the DEIS and the FEIS have ignored numerous issues raised by the local community and other professionals and have failed to address those issues. In addition to being a local resident, I am also the Town of Windsor Deputy Director of Engineering. I have been involved in land development projects in Windsor since 2009. Therefore, I am well informed on the impacts development projects have on our community and this project would be the source of many new impacts never having to be considered before in the Town of Windsor. However, please note that I am writing to you as a resident of Windsor and not as an employee of the Town. I am also amazed how a number of technical reports on the project, provided by Professionals in various disciplines, fail to recognize and address impacts of the project to the surrounding area. Many opposed to this project cite emergency evacuation as a prime reason to not approve this project. As a Registered Engineer I actually view many other aspects of the project as more of a threat to our community.

Many of us also take great exception to how this project was introduced to Sonoma County by the Beltran brothers. They claim that they have always been open with the community and have been very transparent on their proposal. I believe this claim to be as far from reality as possible. Their proposal was introduced to Sonoma County when it first appeared on the front page of our local newspaper, The Press Democrat. Needless to say, the response by the community was swift and loud. They had done a substantial amount of planning and conceptual design before they even went public with their proposal.

Sonoma County is supportive of tribal applications as is the Town of Windsor. However, the proposed project site should not be considered as ancestral homeland of the Koi Nation. It has been shown that the true ancestral homeland of the Koi is located a substantial distance away in Lake County. If the Koi Nation desires to develop this land to benefit the tribal member, they should consider building housing and possibly a school for the children of the families.

Therefore, please provide a final “no project” alternative decision per the FEIS and allow the land to remain a productive vineyard, which is the life blood for many agricultural users in Sonoma County.

Sincerely,

A handwritten signature in blue ink that reads "Carl L. Euphrat". The signature is written in a cursive style with a light blue background behind the text.

Carl L. Euphrat
6203 Lockwood Drive
Windsor, CA

From: Rolando Cardona <RolandoC@drycreekrancheria.com>
Sent: Friday, December 20, 2024 1:38 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Rolando Cardona <RolandoC@drycreekrancheria.com>
Subject: [EXTERNAL] Proposed KOI Nation in Windsor

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Dear Mr. Broussard, I am sending you comments on the proposed KOI Nation application to put land into trust in Windsor California.

Back in 1915 my Great Grandmother and Grandfather were forced on a 75-acre rocky hillside piece of land we now call Dry Creek Rancheria, this land had no running water, too small to hunt, difficult to grow crops, and had a steam that only ran in the wintertime. My Grandmother and Grandfather lived there, my Mother lived there, and I lived there. When I was young, my grandparents and mother took us around the area that we have always identified as our aboriginal territory. Our territory had an abundance of food, game, and water. Although there were other POMO tribes in the area, our ancestral territories were always defined, understood, and respected. When I found out that the KOI Nation was trying to establish themselves in our territory, it affected me personally.

KOI Nation is from Lake County California, 50 miles from Sonoma County, separated by very large mountains. They have attempted to place land into trust 2 other times, Once in Oakland California (100miles), and once in Vallejo California (80 miles), they have also approached us (Dry Creek Rancheria) to purchase our land we purchased in Petaluma California ((60 miles). It is clear that KOI is wanting to find a piece of land that will be located in an area that will make the most return on investment for them and their developers.

I feel there are many conflicted reasons for the DOI pushing to approve KOI's application. One main reason is Assistant Secretary Brian Newland (former KOI attorney) and his influence on Principal Deputy Wizipan to decide in his favor. An approval of KOI will have a ripple effect throughout our nation and will forever take away our tribal territories. Thank you.

Rolando Cardona
Vice-Chairman
Dry Creek Rancheria Band of Pomo Indians

From: Ronald Calloway <ronaldcalloway363@yahoo.com>

Sent: Friday, December 20, 2024 2:19 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Again, absolutely no reponse in FEIS to concerns regarding Koi Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

As the recently retired Superintendent of the Mark West School District, I must state my adamant objection to this casino. For the record, not only did I serve as the Superintendent, but I am also a resident of the school district. I live at 531 Coachlight Place, which is one block from San Miguel Elementary School. This school is within a mile of the proposed casino, and I cannot understand how the Bureau of Indian Affairs could even consider approving a casino so close to an elementary school.

Sonoma County and the Town of Windsor have raised numerous concerns related to water supply, wastewater, traffic, wildfire risk and evacuation routes, law enforcement and public safety, and housing and other economic impacts. Sonoma County Tribes have also highlighted the impacts on them and their cultural resources. Many of the mitigation measures in the Final Environmental Impact Statement (FEIS) are framed as best management practices, but there is no guarantee that they will occur. I am very concerned that the Bureau of Indians Affairs is rushing this process, has not adequately considered the local environmental impacts, and cannot guarantee or enforce the mitigation that is proposed.

Furthermore, as the Superintendent at the time of the 2017 Tubbs Fire, I can truly attest to the enormous dangers of a wildfire in our area. It is important to note the following year in 2018 there was a fire in Paradise, California during the daylight hours when school was in session. If such an event were to occur in our area with a casino added to our community, it would have disastrous consequences. In the case of the Paradise fire, the school district was able to use bussing to transport students out of the area. Unfortunately, the Mark West School District does not have Home to School transportation (bussing). All students either walk to school or are transported by vehicles to school. In the event of a daytime fire on the magnitude of the Tubbs or Paradise Fire, parents would be attempting to get to the school(s) in the Mark West District. With people fleeing the casino, inevitably they would use Faught Road next to San Miguel, which would endanger the lives of students, parents, and staff. Again, this was not addressed in the EIS study. There is no part of the evacuation plan that encompasses Faught Road, which is two lanes. As such, the FEIS does not answer the questions brought forth by the community.

The Bureau of Indian Affairs (BIA) is not listening to the concerns of the community. The promise to consider public comments has not been met. It is

evident in the FEIS that my previous comments in the 3 letters I have sent have not been addressed.

The most glaring one being **the traffic analysis still DOES NOT include Shiloh Road and Faught Road, Airport Boulevard and Faught Road, and Airport Boulevard and Old Redwood Highway, all of which will be routes used to access the proposed casino.** Other streets and intersections *across the freeway* were included BUT NOT THESE ADJACENT ROADS!

Finally, I must reiterate that a casino within a mile of a school is absolutely shameful to consider. As an educator, who has built his entire career in supporting students, I cannot fathom a worse scenario than placing a casino in the proposed location.

Sincerely,

Ronald M. Calloway, Retired Superintendent of the Mark West Union School District

From: Tony Martin yahoo_pi <tonymartin314@yahoo.com>
Sent: Friday, December 20, 2024 12:42 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] YES on Windsor casino

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I find the objections ridiculous and very entitled

Please do approve the koi Nation plan to build in Windsor for what appears to be a lovely facility

All these people saying they don't want it, they are wrong to try to stop this, this is a good place for it and we can use the economic boost

[Yahoo Mail: Search, Organize, Conquer](#)

From: Nadine Salas <nadinecarol24@gmail.com>

Sent: Friday, December 20, 2024 12:50 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] OPPOSE PROPOSED KIO NATION CASINO PROJECT IN WINDSOR CALIFORNIA!

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I'm writing to address my concerns allowing the Kio nation casino project to move forward to be built in my town of Windsor. There has been complete disregard for the voices of the native people indigenous to the proposed land. This project puts our recently established homeland and everything we fought so hard for, at risk economically and physically. There has been widespread opposition from federal, state, and local elected officials, including government Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor town council, state Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thomson, and U.S. Senator Alex Padilla.

It is very insulting and infuriating to see a tribe from a completely separate county, a tribe that is not from here push a project on our ancestral lands! It feels like a slab in the face to the Lytton Rancheria Band Of Pomo Indians. When we Lytton Rancheria Band Of Pomo Indians fought so hard and can't ever have gaming here on our land. The Kio nation project would increase traffic, noise, and crime in our community. The Kio nation casino would cause environmental harm. The Kio nation would depreciate our property values. Thank for your time and please take this into consideration. This would have a negative impact on our community.

From: Alejandro Salas <salas02@live.com>
Sent: Friday, December 20, 2024 12:53 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino Project

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My name is Alejandro Salas, a member of Lytton Rancheria. I am writing you today to voice concerns about the proposed Koi Nation Casino in Windsor. I would first like to start with that there already has been widespread opposition from federal, state, and local elected officials, like U.S. Senator Alex Padilla, Congressman Jared Huffman, Congressman Mike Thompson, state Senator Mike McGuire, including Governor Gavin Newsom, The Sonoma County Board of Supervisors, and the Windsor Town Council. There has been a complete disregard for the voices of native peoples indigenous to the proposed site.

The Koi Nation is a tribe from a completely separate country, a tribe that is not from here, pushing a project on our ancestral lands. It is insulting and infuriating. This project puts my tribes recently established homeland and everything Lytton Rancheria fought so hard for, at risk economically and physically. The Koi Nation Casino Project would depreciate our property values and would cause harm to the environment. It is my hope that my concerns and the concerns of the community are heard, this project would be detrimental to the community. Thank you for your time.

From: Ron Blanc <ronb5555@sbcglobal.net>
Sent: Friday, December 20, 2024 2:44 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Please do not build the KOI N ation Casino

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Hello,

My wife and I have lived for the last 30 years in Saddlebrook, where we raised our family and are now enjoying our retirement. Saddlebrook is in Larkfield, off of old redwood highway, about a mile south of the proposed casino.

In the 2017 Tubbs fire, my wife, myself, and our daughter evacuated at 1 am. The roads were totally jammed going south and we were forced to go North. It was terrifying. The traffic was still bad but we were able to get onto 101 and drive to Ukiah. We felt we were lucky to get out alive.

Since 2017 there has been a number of developments built north of us on old redwood highway, including a huge high density apartment building on Shiloh and old redwood highway. We feel that these developments have already compromised our ability to evacuate safely in an emergency evacuation, and the addition of the KOI casino would significantly increase the chances of us not being able to evacuate safely, and dying in a fire while sitting in our car!

Having witnessed an emergency evacuation firsthand, we absolutely do not believe there are any traffic mitigation measures that will help in an evacuation, short of adding one or two new freeway entrances onto 101 in our area, and we know that is not is going to happen. Fires can move very fast and one can never assume lots of time in an evacuation. People were burnt alive in Paradise, CA and we do not want that to happen to us.

Anybody who thinks that the Koi Casino can be built, even with traffic mitigations, and not significantly impact our safety is lying to themselves and to us.

We implore you not to build the Koi Casino!

Ron and Michelle Blanc
15 Hop Ranch Circle
Santa Rosa, CA 95403

From: Louise Calderon <louisecalderon338@comcast.net>

Sent: Friday, December 20, 2024 2:48 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] KOI Nation Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am again reiterating my concerns about the proposed Koi Nation Casino near Windsor. For the following reasons I am against this project:

1. This proposed site is far from the Koi Nation's aboriginal territory in Clear Lake.
2. The increase in traffic, noise and peace of mind, and environmental harm.
3. The potential depreciated property values, and more importantly, Windsor is a family oriented community, not appropriate for a casino, with the potential of crime that it may bring.
4. We have two casinos in the near radius of Windsor and we do not need anymore in this community.

Respectfully submitted,

Louise Calderon
338 Winemaker Way, Windsor, CA

From: Dawn Johnson <dtjohnsonhuff@comcast.net>
Sent: Friday, December 20, 2024 3:05 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard,

As a resident of Windsor for the last 26 years I firmly join the State of California, the County of Sonoma, the Town of Windsor, and every neighbor I have spoken to, in opposing the Shilo Resort and Casino Project. Furthermore, I unequivocally support the local tribes in their current lawsuit related to the project.

Windsor's Town Council fosters and promotes our town as a friendly, family oriented community. In the years I have lived here they have done an excellent job of promoting physical health by developing local parks that are well used. The proposed Shilo Resort and Casino Project is directly opposite to Esposti Park which is highly utilized for soccer and baseball leagues. In addition, our heavily used Shilo Regional Park also abuts the proposed project. Nothing about the resort/casino project supports our family oriented community. To think a casino should be built across from residential neighborhoods, two busy parks and an active church, shows total disregard for our community.

The Shilo Resort and Casino Project is located on land surrounded by small outdated rural roads that are already struggling with dense traffic. Old Redwood Highway is a State Highway (SR 254) and any attempts to expand it would need to be addressed by the State of California. The segment of Shilo Road that would support the project is one lane in each direction, and abuts private property. The Windsor Planning Commission stated at one meeting that there was no viable way to expand Shilo or Old Redwood Highway. The resort/casino project will highly impact day to day traffic flow, as well as resident safety in the event of yet another mass evacuation. Once again, total disregard for our community.

It appears that the Bureau of Indian Affairs think only of potential financial gain. There are 43 miles between The Graton Resort and Casino, and River Rock Casino. If the Shilo Resort and Casino Project is built, that will be three major casinos within that 43 miles. Logically, the more casinos built, the less financial gain for each casino. So not only are you disrespecting the local citizens, but the two local tribes with VALID claims to his land.

Sincerely,
Dawn Johnson Huff
207 Deanna Place
Windsor, CA

From: Holly Smith <hollyherdersmith@gmail.com>
Sent: Friday, December 20, 2024 3:14 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To Mr. Broussard and Other Promoters:

As I am sure you all know, there is currently a very large "affordable housing" (densely populated) project being built at the same intersection as the proposed casino. Both Old Redwood and Shiloh Road are two lane roads that weren't designed for heavy traffic. As a Windsor resident, I am horrified at the thought of yet another reason to draw more vehicles to that area.

In addition, the residents of Town of Windsor are very concerned about the apparent increase in crime, especially vandalism after dark. We want to keep our community as safe as possible for the young families who chose it for its safety and tranquility.

Please find another location for your casino. We don't want the drinking, gambling or increased traffic that your project promotes.

Very truly yours,

Holly H. Smith
Windsor, CA

From: adams.dorothy45@comcast.net <adams.dorothy45@comcast.net>
Sent: Friday, December 20, 2024 3:21 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Casino project near Windsor:
I am against it!
Sorry, no financial support.
Dorothy R. Adams

14 DECEMBER 2024

MR. CHAD BROUSSARD

TO YOU AND THE BUREAU OF INDIAN AFFAIRS,
I OBJECT TO THE PROPOSED KOI NATION CASINO IN WINDSOR,
CALIFORNIA. AS YOU KNOW, WE ALREADY HAVE TWO
CASINOS IN SONOMA COUNTY. THE ONE IN ROHNER PARK IS
VERY LARGE, AND THEY PLAN ON BUILDING A 3,000 SEAT
THEATER. THIS WILL ADD TO TRAFFIC AND NOISE. AND NOW
12 MILES AWAY, ANOTHER CASINO? THAT MEANS MORE NOISE,
CRIME INCREASE AND TRAFFIC. WE, THE PEOPLE DO NOT
WANT ANOTHER CASINO IN SONOMA COUNTY.

THANK YOU Jim Richter

PACIFIC REGIONAL OFFICE
 2024 DEC 19 PM 4:28
 BUREAU OF INDIAN AFFAIRS



Ms. Anne Kirlian
 426 Tamara Way
 Windsor, CA 95492

Dec 15, 2024

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

Re: FEIS Comments - Shiloh
 Resort and Casino Project

Dear Ms. Dutschke:

Gen a nutshell, I say NO to casino in our residential community. A residential community comprised of families with small children, many retirees, and some seriously ailing elderly - all within walking distance of proposed location. There is an elementary school also nearby. A truly residential community where a casino DOES NOT belong.

A short drive south of us is a casino. A short drive north of us is another casino. We do NOT want a casino in our residential community.

I sincerely hope you get my message:

NO casinos in residential community, ever!

Respectfully,
 Anne Kirlian

PACIFIC REGIONAL OFFICE

Dear Mr. Broussard:

2024 DEC 20 PM 12:18

My name is Antonio Salas. I am a member of the Lytton Rancheria Band of Pomo Indians. I am writing this letter in opposition to the proposal for the Koi Nation casino project in Windsor, California. My tribes' ancestral homeland is in Windsor, and we just recently were approved to take that land into trust and within the last year, many tribal members have moved onto our homeland. By accepting this proposal to allow Koi Nation to build a casino near my tribes' homeland, will not only have negative impacts to my tribe, but it will also have negative impacts to the community of Windsor.

When Lytton Rancheria was reestablished as a tribe in 1991, the state required that the tribe was to never build a casino in Sonoma County, and the tribe has honored that requirement. It makes no sense that now a tribe, the Koi Nation tribe, is even being considered to put a casino just miles from Lytton Rancheria's ancestral homeland. The Koi Nation has no ties to Sonoma County, other than traveling through the area on trails that led to their homeland. Their homeland is located in Lake County, over 75 miles from where they are proposing to build a casino. Had the Koi Nation proposed to build a casino in Lake County, I would not have to write this letter.

By allowing Koi Nation to proceed with this project, you will be bringing more traffic, noise, and crime to the small city of Windsor, which will inevitably depreciate property values in the area. Lytton Rancheria has worked very hard to reestablish our homeland and maintain a great relationship with Sonoma County as well as the state of California. By allowing this proposal to make it this far is like a slap in the face to Lytton Rancheria.

As you may know, Bryan Newland, assistant secretary of Indian affairs, used to represent the Koi Nation Tribe as their attorney before becoming assistant secretary of Indian affairs. In my opinion, this creates a conflict of interest because he has had a previous business relationship with Koi Nation. Also, if this proposal goes forward, it will create a precedence for other tribes to do the same. Bryan Newland could do the same in his home state of Michigan, citing the Koi Nation Proposal, if this plan succeeds. The Koi Nation has made several attempts to make this same proposal to build a casino in the Bay Area. They have not had any success because it is not their homeland.

All local tribes in the Sonoma County area, including Lytton Rancheria, have opposed this proposal and it seems our voices are being disregarded. There is widespread opposition from

federal, state, and local elected officials, including Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, state Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson, and U.S. Senator Alex Padilla.

I sincerely urge you to deny the proposal Koi Nation is making. By trying to get this proposal through during the holiday season, it seems that the Koi Nation is hoping the local tribes and the community of Windsor will be more focused on the holidays rather than this proposal. That is not a fair and just way to try and get things done, in my opinion, and the surrounding community will not stand for it. If the Koi Nation wants to build a casino, they can do it in their homeland of Lake County, not in Windsor, less than 5 miles from the Lytton Rancheria reservation. The Lytton Rancheria is not able to build a casino in Windsor, which is our homeland. Why should Koi Nation be able to do it?

Sincerely:

Antonio Salas
Lytton Rancheria Tribal Member

Chris Lamela
9081 Conde Lane
Windsor, CA 95492
December 16, 2024

PACIFIC REGIONAL OFFICE
2024 DEC 19 PM 2: 53
BUREAU OF INDIAN AFFAIRS

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

Additional recipients:
President Joe Biden, Washington DC
California Governor Gavin Newsom
California Congressman Jared Huffman, California 2nd district
California Senator Laphonza Butler
California Senator Alex Padilla
Deb Haaland, Secretary, U.S. Department of the Interior

Subject: FEIS Comments, Shiloh Resort and Casino Project

This letter contains response to the proposed Koi casino Final Environmental Assessment (EIS). I am writing on behalf thousands of others who may or may not have had the opportunity to respond to the EIS; I submit this writing in my name alone.

As a point of interest, I hold three university degrees including a Masters Degree in International Business and Economics from a prestigious university. I trust this credibility will lend authority to my writing here.

I was instructed by Chad Broussard of the BI Sacramento office of the BIA that only responses directly referencing the EIS will be considered. While this is awkward because of so many subjects not covered in the EIS I did my best to comply.

Therefore, I present my responses to this Final Environmental Impact Statement.

RESPONSES TO FINAL EIS

MY APPEAL TO DECISION MAKERS

The person who has been designated as decision maker for this proposed development is **Wizipan Garriott**, a member of the Rosebud Sioux Tribe. He serves as Principal Deputy Assistant Secretary for Indian Affairs at the U.S. Department of the Interior (Department). Prior to joining this Administration, he ran his Tribe's economic development corporation. I can only hope that he will read this and take the material seriously as this is a serious matter that will affect thousands of innocent, upstanding citizens. I can only hope that his sense of justice and the understanding that he represents the people of this nation for the better good of all, not just the Tribe. I hope that this will allow him to take into account the very strong and articulate opposition received from so many citizens and politicians and remember the thousands of innocent citizens whose lives will be **destroyed** by this development.

Deb Haaland, the Secretary of the Interior, is the ultimate decision maker in this matter. Ms. Haaland is of Pueblo of Laguna descent having served various offices with the tribe. Without doubt she is the ultimate decision maker in this matter. History will show that if this project is approved that she oversaw a corrupt Bureau of Indian Affairs and the legacy of her previous good work will be destroyed. A few hundred Indians will remember this positively. But because of the extremely dangerous precedent this will set, where any tribe anywhere can claim any land regardless of their homeland disregarding the homelands of local tribes' rightful claims to homeland. Three hundred million Americans outside of the tribes will suffer and they will remember this disaster as her legacy if that occurs.

**MAKE NO MISTAKE. THIS PROJECT CANNOT BE APPROVED
OR MILLIONS OF AMERICANS WILL SUFFER!**

“No mitigation required”. The term “No mitigation required” is used throughout this EIS that belittles impacts caused by this proposed development. Those will be continuously pointed out in this response.

SECTION ES.3

STATEMENT: “The purpose of the Proposed Action is to facilitate tribal self-sufficiency...”

RESPONSE: Through the state’s Revenue Sharing Trust Fund the Koi Tribe is allocated \$275,000 every quarter. The Koi have received a total of \$24.4 million since the plan’s inception in 2000, money that they will continue to receive, over one million dollars a year for eternity. **Their claim of poverty is nonsense** and there is no need for them to build this casino when that money can be used for other ventures that will help them and which will not destroy communities and negatively impact local tribes.

THIS IS A FACT!

SECTION ES.3

STATEMENT: “The purpose of the Proposed Action is to facilitate...self determination...”

RESPONSE: The Koi have claimed that part of their self determination is to lay claim to land located in Sonoma County, California. There is substantial information that refutes this claim especially in language in lawsuits filed against the city of Clear Lake, California claiming that the city defiled the Tribe’s historic lands. **In their own words!**

LAWSUITS FILED AGAINST THE CITY OF CLEAR LAKE BY THE KOI

The following shows lawsuits filed by the Koi against the city of Clear Lake that show in the Koi’s own words that their homeland and the place they belong is Lake County not Sonoma County. Their claim of self-determination being to claim Sonoma County as their homeland is blatantly false.

LAWSUITS DECLARING LAKE COUNTY AS KOI HOMELAND

A statement in a letter to the BIA stated this clearly: “In order for the Department to approve this application, the purpose of which is to conduct gaming, the Department must make a determination pursuant to the Indian Gaming Regulatory Act (IGRA) restored lands exemption. The restored lands exemption requires the applicant tribe, here the Koi Nation, to have a ‘significant historical connection’ with the proposed gaming parcel, such that the Department’s acquisition of the land in trust for the Koi Nation would constitute a ‘restoration’ of the Koi Nation’s tribal lands.”

Further definition states, “Significant historical connection” as “the land is located within the boundaries of the tribe's last reservation 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. The concept of significant historical connection is intrinsically wrapped into the concept of cultural affiliation that is, a tribe’s subsistence methods, cultural practices, belief systems, and traditional ecological knowledge are rooted in the geographic area where a tribe was historically located.”

Cultural affiliation must be established by the preponderance of the evidence based on “geographical, kinship, biological, archeological, anthropological, linguistic, folklore, oral tradition, historical evidence, or other information.” **Again, none of that exists for the Koi in Sonoma County. Koi Nation meets none of the requirements for exemption of homelands declaration.**

The following clearly shows in the Koi’s own words that the Koi Nation’s homeland is in Lake County, 50 miles from the proposed project.

The Koi Nation sued the City of Clearlake three times to date. Those lawsuits are explained below along with excerpts from those lawsuits that clearly profess that Lake County is the Koi homeland. **Again, Lake County is their homeland in their own words as shown in the lawsuits.**

Lawsuit March 3, 2023

This lawsuit filed on March 3, 2023 by the Tribe against the City of Clearlake (the City) alleges the City was planning to build a hotel and extension of 18th Street (the Project).

The following are excerpts from those lawsuits. Those lawsuits declare that Lake County is the Tribe’s homeland in the Koi’s own words.

Lawsuit Section: Preamble

Here, the requested exception is the restored lands exception that allows gaming on land acquired in trust after 1988 if the lands are taken in trust as part of “the restoration of lands for an Indian tribe that is restored to Federal recognition.”

RESPONSE: This shows that restored land is in Lake County, the new land in Sonoma County of course is not. **Sonoma County land is a new acquisition and not subject to any exemption.**

Law Suit Section: Background

“For most of its history the Koi people traveled throughout the Russian River Valley [not specifically through Windsor], primarily living at Clear Lake in what is now Lake County, California.”

RESPONSE: “Traveled though” is not “lived in” and this states clearly that Sonoma County is not their homeland. **The Koi states continuously that Koi ancestors traveled through Windsor. This is blatantly false.** Traveling from Lake County to the coast and back, they would not have traveled south through Windsor making a triangle in their journey. They likely traveled the direct route through Healdsburg, 5 miles to the north or even Hopland, 14 miles north. This is yet one more nonsense claim the Koi say to make it **seem like they traveled through Windsor and thus have some kind of mythical claim to Windsor! This claim is patently false.**

There is also evidence that the Koi did not travel to the coast at all. Instead, other tribes traveled to Lake County to trade fish and other items which the Koi had in abundance.

Law Suit Section: Location and Setting

In this lawsuit the Tribe has declared, “The Project Site is located outside of, but contiguous to, the Town of Windsor and approximately 12 miles from the Koi Nation’s tribal headquarters in Santa Rosa.”

RESPONSE: The claim of the Koi Nation’s tribal headquarters was “made up” for the sake of this project to meet the “main office” definition to be within 25 miles of the site. Their tribal headquarters is in Lake County, 50 miles away. As these lawsuits show, the Koi have no claim to Santa Rosa as their headquarters or any other place in Sonoma County.

Other content of lawsuits

*Note that **bold lettering** in the following has been inserted by me for emphasis.*

Paragraph 2: “The City seeks to allow the Project to proceed within its municipal boundaries [city of Clear Lake] and the within the **aboriginal territories** of the Tribe.”

RESPONSE: The term “aboriginal territories” clearly shows their homeland land is within the Tribe Lake County “aboriginal territories” another name for “homeland” – not Sonoma County!

Paragraph 5: “The Tribe has already lost many important sacred sites and suffered culturally from the City’s pattern and proactive permitting development without taking into account the **impacts of the Tribe’s ancestors**, their cultural items, the tribal cultural landscape.”

RESPONSE: The “impacts of the Tribe’s ancestors” clearly represents “possession” of sites located within the City stating existence of their Lake County homeland. This is ironic given the Koi’s absolute disregard for these items claimed by local Sonoma County tribes who have the true right to their native homeland.

Paragraph 16: “The Project is within the **aboriginal territories** of the Tribe, and the area of traditional and cultural affiliation of the Tribe, and the Tribe has a cultural interest and authority in the proposed Project area.”

RESPONSE: This effectively affirms the Tribe’s “aboriginal territories” in Lake County and that the Tribe has authority over land in Lake County, their homeland.

Paragraph 26: “Representatives of the Koi Nation expressed concern regarding a home that was **historically occupied** by a tribal member within the project vicinity.”

RESPONSE: However, the home was located approximately 0.2-mile south of the project area. This indicates the triviality of some claims made by the Tribe.

Paragraph 53: “The spoils [leftovers from construction of the airport or other areas] ... contain extensive archeological materials from **prehistoric site** ... Fragmentary human remains are also likely to be contained in the deposits.”

RESPONSE: This says that their ancestors were buried here as should be because Lake County is their ancestral homeland. And the Koi homeland to this day.

Paragraph 97: “The City is located within the **aboriginal territory** and area of traditional and cultural affiliation of the Tribe, and it contains numerous documented and undocumented sites used and inhabited by Ancestors Tribal members.”

RESPONSE: The term “aboriginal territory and area of traditional and cultural affiliation” is a strong statement laying claim to the Koi Lake County homeland.

Paragraph 102: “Sites within the City include **sacred sites**, village sites, burial grounds, dance pits, ceremonial sites, tool and trade blank making sites, currency making sites, hunting and gathering areas, fishing areas, gathering areas for plants, medicines, ceremonial plants, food, fiber, or basketry materials, ... cultural landscapes, and the original location of the Lower Lake Rancheria.”

RESPONSE: This detailed list of materials and activities clearly show the activities and materials necessary for the maintenance and growth of the Koi’s Lake County homeland. The place that is their homeland to this day.

Paragraph 106: “The Tribe told the City that it had a very high likelihood of encountering ... and intact village site that is many thousands of years old.”

RESPONSE: Laying claim on behalf of ancestors who were on their homeland. Another claim to Lake County as their current homeland.

Paragraph 109: “The Tribe has lost many important sacred sites and **suffered culturally** from the City’s development...”

RESPONSE: To “suffer culturally” states that there was material damage to the Koi homeland by the City’s actions. Another claim to Koi Lake County homeland.

Lawsuit July 14, 2023

Paragraph 88: “The City is located within the **aboriginal territory** and area of traditional and cultural affiliation of the Tribe, and it contains numerous documented and undocumented sites used and inhabited by Ancestors of Tribal members. Some of these sites are the oldest in California, many over 10,000 years old.”

RESPONSE: Once again we see that the Koi “aboriginal territory” contains sites used by the Tribe’s ancestors for time eternal. This shows a deep historical connection to Lake County as the Koi lay claim to their homeland, Lake County.

Paragraph 108: “The Tribe has already lost **many important sacred sites** and suffered culturally from the City’s development occurring without taking into account the impacts on Ancestors...”

RESPONSE: The loss of “many important sacred sites” and cultural suffering shows the loss to the Koi for the City’s actions and “occurring without taking into account the impacts on Ancestors” says the City’s ignoring those impacts were harmful. This claim is interesting and contradictory as I will later show how the Sonoma County local tribes’ ancestors were not taken into consideration by action of the Koi.

Paragraph 110: “This is also a religious freedom issue. Ancestor reverence is a part of the Tribe’s religion, so **desecration or re-desecration of a site of cultural significance** to Tribal Ancestors represents a religious harm.”

RESPONSE: To claim this as a “religious freedom issue” is a stretch. The term “desecration or re-desecration of a site of cultural significance” shows the harm the City put upon the Koi in their claims of Lake County as their homeland.

Lawsuit June 14, 2024

Paragraph 3: “Construction of the Project will involve earth disturbing activities that will significantly **impact tribal Cultural Resources** (“TCR”), and irreparably harm the Koi Nation, its Ancestors, and their cultural items.”

RESPONSE: The term “impact of tribal Cultural Resources” and “irreparably harm the Koi Nation, its Ancestors...” shows the harm made to the Koi by the City. **This claim can only be made if Lake County is the Koi homeland as these lawsuits clearly show.**

Paragraph 8: “The Koi Nation is traditionally and culturally affiliated with the Project area [Clear Lake area].”

RESPONSE: This statement stands by itself: This is a very clear claim that the Koi affiliation with Lake County as the Koi homeland is undeniable.

Paragraph 16: “The Project is within **the aboriginal territories** of the Koi Nation, and the area of traditional and cultural affiliation of the Koi nation, and **the Koi Nation has a cultural interest and authority** in the proposed Project area including a clear, present, and beneficial right....”

RESPONSE: Claiming “cultural interest and authority” demonstrates the “aboriginal territories” and their rights over their Lake County homeland. A tribe can only lay claim to one homeland as they do here asserting that this is their ancestral and current homeland. **Sorry, only one homeland to a customer.** They cannot lay claim to Lake County and Sonoma County at the same time. Lake County is their homeland.

CONCLUSION: THESE CLEAR STATEMENTS – IN THE KOI’S OWN WORDS – SHOW LAKE COUNTY IS THE KOI HOMELAND – NOT SONOMA COUNTY!

The Koi Tribe has falsely stated they have significant historical connection with some or all of Sonoma County which I have just shown is false, **again in their own words!** If the BIA approves this project the BIA will open the door for any tribe anywhere in the United States to simply purchase property, declare it as their homeland and effectively invade the tribal rights of local tribes as well as raining destruction upon the local community.

You could have a casino as your next door neighbor!

This is a disaster waiting to happen that is obviously being highly promoted and being rushed to approval by the BIA for reasons unknown. **This precedent would be horribly destructive for the entire country and for every person in the United States. You could have a casino next door to your home!**

LAKE COUNTY IS CLEARLY THE KOI HOMELAND.

The Koi have no "significant historical connection" to claim the property in Sonoma County and their claim **for the proposed development as homeland is absurd and this development absolutely should not be allowed to proceed.**

That decision should be made with permanent prejudice and never considered again.

THE BIA CANNOT SET THIS HORRIBLE PRECEDENT THAT COULD DESTROY EVERY COMMUNITY IN THE NATION!

Additionally, testimony by a Tribal elder further shows that the Koi homeland is in Lake County.

DEPOSITION OF A TRIBAL ELDER DECLARING LAKE COUNTY AS KOI HOMELAND

In a document titled, "Deposition of Clifford Salvadore" which is dated August 20, 1960 we find many claims about the homeland of the Koi tribe in Lake County. Mr. Salvadore was 87 years old when he made this deposition. This deposition was taken in part to support the various conflicts during that period in Lake County. His story is very compelling because it tells of life for the Koi in the late 1800's and into the twentieth century.

This deposition clearly shows that the Koi ancestral homeland is in Lake County.

The following are excerpts from that deposition. My comments are in *italic*.

- Mr. Salvador explained that there was an island on Clear Lake located a few hundred yards from what is now the City of Clearlake. The island was named Koi Island by the tribe. There were two islands, Koi Island and Yo Island occupied by the Yo Indians. *Koi Island has since been renamed as Indian Island.*
- "I was born on Koi Island August 22, 1872. My brothers and sisters were born on Koi Island."
- "There were 15 houses on the Koi Island with my family". *There were many other homes occupied by other Koi families.*
- "There was only my tribe on Koi Island. The Yo tribe lived on Yo Island."
- "We hunted and fished back in those days. We did not grow crops for food."
- "My father and mother were buried on Koi Island. Many were buried on the island but I don't remember how many."
- "Our main cemetery was on Koi Island."
- "After the Koi left the island over two thousand were buried by Sulfur Banks."
- "The dead were cremated on wood piles and their ashes buried."
- "We were only allowed to be buried in our own cemetery. The Catholics were buried in their cemetery."
- "The island got overpopulated and so some moved away to the shore where they took jobs working for the white man. Many took white peoples names."
- "Many people moved off of Koi Island because it became too crowded." *The island is 55 acres that varies with lake water level.*
- "When we moved off the island we would move to Cash Creek or the 'south side.'"
- "On the land away from the Island, the Koi lived on the north side of creek, Yo lived on south side."

- “Koi got horses when the Spanish came.”
- “Before the white people came there were wars with tribes as far away as Yountville and Berryessa over acorns, pinola weed and fishing rights trying to drive the Koi from our island.”
- “Many Koi were taken as slaves by the other tribes.”
- “The white people took over the land little by little. A house here, a fence there.”

This interview shows the Koi history is richly embedded in their ancestral homeland in Lake County. This also shows that any claim to a different Koi homeland is pure nonsense.

As articulated earlier in this document, any Koi claim to Sonoma County would be destructive to the local tribes and destroy the surrounding community.

SECTION ES.3

STATEMENT: “The purpose of the Proposed Action is to facilitate...economic development...”

RESPONSE: As stated earlier, the Koi have received over \$24 million in California trust account money. Yet, in addition to trying to pursue this development, they have tried to lay claim to other “homelands” before.

Another indication that Sonoma County is not the Koi homeland is shown by their casino shopping as shown here.

KOI HISTORY OF CASINO SHOPPING

As shown in the previous attachment about the declarations in the various lawsuits of Lake County as the Koi homeland, it seems a bit odd that they are so anxious to find another “homeland” and their determined fashion in doing so.

The Koi have now declared that Sonoma County as their homeland.

That is not true.

It can't be true.

In fact the Koi have been casino shopping since 2005 – nearly 20 years!

Before declaring Sonoma County its homeland they declared Oakland, California their homeland. Then they declared Vallejo, California their homeland. How do we know? Because they attempted to build casinos in Oakland in 2005 and then Vallejo in 2014. And now they have declared Sonoma County their homeland.

Was Oakland their homeland? **NO!**

Was Vallejo their homeland? **NO!**

Is Sonoma County their homeland? NO!

This clearly shows the insincerity of the Tribe and the desperation of the Tribe to build a casino anywhere. ANYWHERE! **The question is: If they don't get their casino in Sonoma County, where will their next homeland be?**

I will now describe their efforts to build a casino in Oakland, their homeland, and then in Vallejo, their other homeland. And of course, their new homeland in Sonoma County.

2005 Oakland, California, Koi homeland on the bay

In 2005, the Koi Tribe officially announced its plans to build a world-class tribal gaming facility, resort and spa near the Oakland International Airport. The Tribe's Crystal Bay Casino, Resort and Spa project was planned to create an estimated 4,400 new jobs, 2,299 directly with an annual payroll approaching \$80 million and \$1 billion in overall annual economic activity for the local area. The Tribe also began talks with the city to explore potential benefits the project could bring to the local economy. Discussions included a proposal for annual payment from the Tribe to mitigate impacts on city services, including funding for additional police and fire protection, reimbursement for lost property taxes and parking revenue, and road and traffic improvements. The proposal was funded by Florida Real Estate developer Alan Ginsburg. Facing strong community opposition, the Tribe dropped its plans.

Vallejo, California, the *other* Koi homeland on the other side of the bay

In late 2014 the Tribe was one of eight applicants for the development of a site in Vallejo, California, which had been part of the Mare Island Naval Shipyard. Four applications involved Indian gaming. The Tribe partnered with developer Cardish Company for a proposed \$850 million project, promising to pay the city between \$10 million and \$20 million a year, along with generating thousand of jobs. In January 2015 the Vallejo City Council voted to reject all gaming proposals and to concentrate solely on industrial proposals for the site.

And now we arrive at Sonoma County, the so-called new Koi homeland!

In September 2021 the Tribe announced that it had purchased a 68 acre parcel vineyard site on unincorporated land in Sonoma County on the southeast border of Windsor, California for \$12.3 million which was twice the value of the property. They announced plans to develop a \$600 million casino resort *after* that purchase. *Nobody was informed of their intentions before that purchase!*

Like the Koi's other "homeland" proposals it is also backed by deep pockets. This time by the Chickasaw Nation in Okalahoma which owns 23 casinos in that state. They also own and operate the Winstar Casino, **the largest casino in the world!** The agreement calls for Global Gaming Solutions, a wholly-owned Chickasaw business to manage and operate the proposed Koi casino. **This is an incredibly deep pocket that would end up being the true owner of this proposed casino – not the Koi.** The arrangement calls for the two tribes to be joint owners. This is nonsense. Chickasaw money would be the entire source of funding and despite what may be on paper the Chickasaw would be the true owner of the proposed casino and as the owner could do whatever they want and run the casino any way they please and there is nothing the BIA – or anybody else – can do about it.

This means a huge out-of-state casino would have invaded California as the owner of the proposed largest casino in California, violated the sacred homeland of legitimate local tribe and effectively destroy those tribes financially. **The Chickasaw as outsiders would likely have absolutely no concern whatsoever about destroying our local community. Money would be all that matters.**

**THE KOI OBVIOUSLY DOES NOT CARE.
WE SURE HOPE THAT THE BIA CARES.**

THIS SITUATION CANNOT BE MITIGATED!

SECTION ES.5 SUMMARY MATRIX

I did not respond to the section, Summary, instead addressing these issues in the detailed text of this EIS.

SECTION 1.1 SUMMARY OF THE PROPOSED ACTION AND ENVIRONMENTAL REVIEW PROCESS

STATEMENT: "The BIA is the federal agency chartered with reviewing and approving tribal applications to take the land into federal trust."

RESPONSE: This statement implies that the process of review and approval will be done with honesty and integrity by the BIA, and taking into account the well-being of the entire community, not just the Tribe itself. But the BIA has shown anything but integrity in this process.

Note that the following expresses my opinion on this matter based on certain facts provided to me.

CORRUPTION: THE BIA BROKE THE LAW

Laws create regulations. Therefore, regulations are laws. To ignore a regulation is to ignore the law. To not conduct a operation as required by regulations is to break the law. **For the BIA to knowingly break the law under the color of authority is corruption in its purest form as it violates the trust of the American people.**

Under this definition, the BIA broke the law repeatedly during their consideration for approving the proposed casino under the name of corruption **which is a criminal offense of fraud.** There is no question here.

The BIA actively ignoring the law to benefit the Koi is corruption in its purest definition. The BIA has committed criminal offenses time and time again.

The BIA should already have known to kill this project as it was met with the enormous number of negative responses received to the Environmental Assessment published last year and the second this year. Those responses stated many, many reasons clearly why this project should already have been killed. **There were over 1,200 pages of negative responses from community members and government officials opposing this project from the issuance of the last EIS.** Those government officials included the Town of Windsor, Sonoma County government, California congressional representative, California State Senators and Gavin Newsom, Governor of the State of California. **All opposing this project!**

Here are the ways the BIA broke the law.

1. Why the hurry?

Why the hurry? This has taken only three years to come to this point.

The River Rock Casino, located 20 miles north in back country with virtually no opposition took 8 years for approval to take the land into trust.

The Graton Casino located only 14 miles away to the south took 5 years with minimal opposition. That casino was built on bare land more that 2 miles from neighborhoods. **This proposed development is across the street from homes, a park, schools, across from a church and only a block from another church!**

This development has been met with a tsunami of opposition for violation of native tribes' rights and destruction of the community. Based on the much longer timelines of other casinos developed in the county, this clearly demonstrates that the BIA is rushing this approval. There are no specific BIA regulations governing the timeline for approval. **The apparent rush to approval here is highly suspicious.**

Those two casinos located so closely to this proposed casino is yet another reason why this project should be killed. **How many casinos does our small county need?**

2. Lack of Tribal consultations

The BIA requirement to consult with local indigenous tribes was not conducted. There are regulations (law) requiring such consultation. The local tribes have complained to the BIA that they were not consulted. The regulation (law) was not adhered to by the BIA and thus the law was broken. The local tribes' complaints were clear:

- Contrary to what the EA states (released in 2023), meaningful and complete tribal consultation was not conducted prior to the publication of the EA.
- Tribal cultural resources on the property have not been properly analyzed.
- The proposed mitigation measures were designed without the input of the culturally affiliated tribes and are woefully inadequate for protecting other tribes' cultural resources. Most of the mitigations stated were meaningless and did not occur anyway.
- The BIA did not properly consult with the local tribes pursuant to the National Historic Preservation Act (NHPA) Section 106.

The regulations (law) covering this:

Document: Tribal Consultations VII. Consultation Guidelines

"A. Initiating Consultation.

When considering a Commission Action with Tribal Implications, the Commission will notify the appropriate Indian Tribe(s) of the opportunity to consult pursuant to this Policy. The Commission will strive to ensure that a notice is given at least 30-days prior to scheduling a consultation. If exceptional circumstances prevent notice within 30-days of the consultation, an explanation for the abbreviated notification will be provided in the invitation letter. An Indian tribe may request an extension for timelines associated with this Policy."

"D. Stages of Consultation

The Commission will carry out the consultation stages described below for a Commission Action with Tribal Implications. The Commission will solicit the views of affected Indian tribes regarding the process timeline to consult on a Commission Action with Tribal Implications. The Commission will work with Indian tribes to structure a process, to the extent feasible, that considers specific Indian tribal structures, traditional needs, and schedules of the Indian tribes. The Commission will make all reasonable efforts to comply with the expressed views of the affected Indian tribes regarding the process timeline at this Stage, taking into account the level of impact, the scope, and the complexity of the issues involved in the Commission Action with Tribal Implications, along with the other factors driving the schedule. The process will be open and transparent. The Commission will then proceed with the expectation that interested Indian tribes will respond within a reasonable time period."

This BIA did not conduct these consultations. **This clearly demonstrates the BIA deliberately broke the law.**

3. Requests for information not responded to or within timely manner

The regulations (laws) require expeditious responses to requests for information from the tribes. The tribes have made this complaint:

It took almost 9 months for BIA to share various reports with the tribes (the law requires 15 days!). The BIA failed to respond in writing to meeting requests until September 2023 after repeated meeting requests, in writing, in August 2023. At the time of submitting those comments, the BIA had yet to meet with the tribes. Also, the BIA published the draft EA, including its conclusions of less-than-significant impacts to cultural resources, despite the fact that it had not properly consulted with the tribes pursuant to the National Historic Preservation Act (NHPA) Section 106.

Other regulations (law) governing communication include:

Appeals From Administrative Actions

Posted by the Bureau of Indian Affairs on Nov 30, 2022

Subpart F Appealing Inaction of an Agency Official

“§ 2.601

When must a decision-maker respond to a request to act?

A decision-maker receiving a request as specified in § 2.600 has **15 days from receiving the request to issue a written response**. The response may be a communication response, a decision, a procedural order that will further the decision-making process, or a written notice that a decision will be rendered by a date no later than 60 days from the date of the request.”

The law says 15 DAYS! To take more than 90 days or 9 months in one case to respond clearly broke the law.

“§ 2.605

If the official fails to timely direct the decision-maker to respond to the request for decision, or if the decision-maker fails to respond within the time frame identified by the official pursuant to § 2.604, you may appeal the continued inaction by either agency official to the next highest officer in the chain of command above both agency officials.”

These regulations clearly specify a timeline for responses and the local tribes were not allowed access to higher BIA officers. **BIA’s failure to adhere to these timelines and not permit access to senior BIA officials show the regulations (law) were deliberately broken. The BIA knew these timeline and access requirements yet chose to break the law by not responding in a timely manner and appropriately.**

THESE ARE FACTS SUPPORTED BY THE BIA'S POOR BEHAVIOR.

SECTION 1.3 BACKGROUND

STATEMENT: "The Koi Nation...headquartered in Santa Rosa, California."

RESPONSE: The location of Santa Rosa was chosen to show proximity to the proposed site. The office in Santa Rosa was established in 2000 in anticipation of this proposed development.

STATEMENT: For most of its history the Koi people traveled throughout the Russian River valley...

RESPONSE: "Traveled through" is not "lived in." As stated previously, it is highly unlikely that the Koi ancestors traveled through Windsor area. The straight line from Lake County to the coast would have taken them through Healdsburg, 5 miles to the north or Hopland 39 miles to the north. They would not have come through Windsor because that would be out of the way and create a "triangle" in their journey. **A claim that their ancestors came through Windsor is nonsense.**

2.12 RESORT AND CASINO FACILITY

Parking

STATEMENT: The EIS states that there will be a total of 5,119 parking spaces.

RESPONSE: This will be discussed further in this response under Wild Fires

2.13 WATER SUPPLY

THE DIAGRAMS SHOWN IN THIS EIS ARE INCOMPLETE AND DELIBERATELY MISLEADING!

STATEMENT: “The estimated average daily water usage for Alternative A would be approximately 170,000 gallons per day (gpd) of potable water...water would be provided via on-site wells.” Another statement says, “The wells would be drilled to a depth of 700 feet below ground surface.”

RESPONSE: The following is based on data from “California’s Ground Water Bulletin 118”.

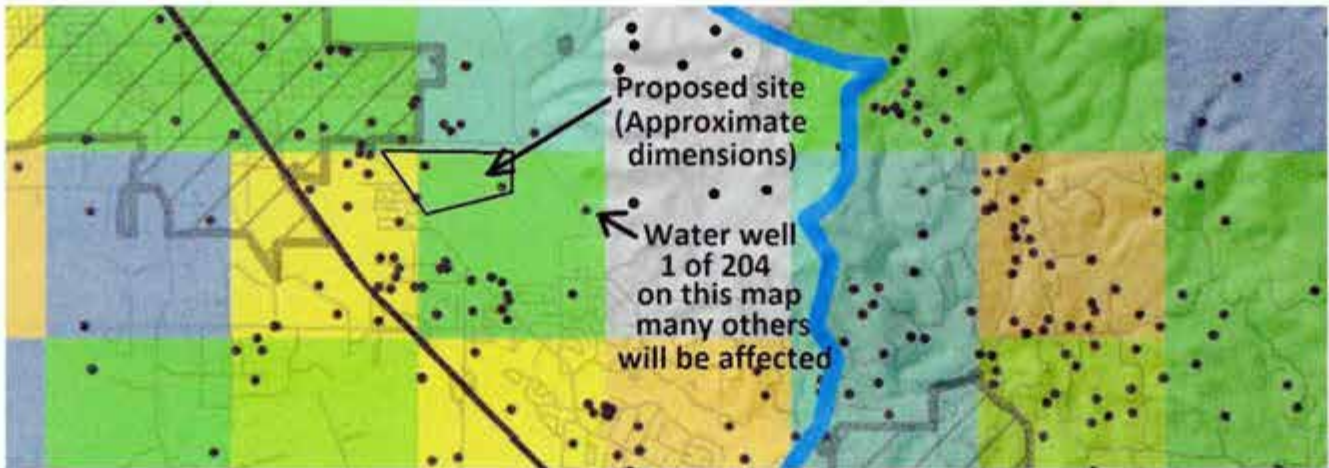
The Santa Rosa Plain Subbasin is the aquifer that this water will be drawn from. The southern portion ranges from Healdsburg to Petaluma and it about 9 miles wide, called the Merced Formation, in the area of the proposed development.

Studies done of the Merced Formation show that well yields range from 100 to 1,500 gallons per minute (gmp). The referenced study stated, “The Santa Rosa Plain ground water basin in whole is about in balance.” **The draw of 170,000 gallons a day will clearly throw that balance off.**

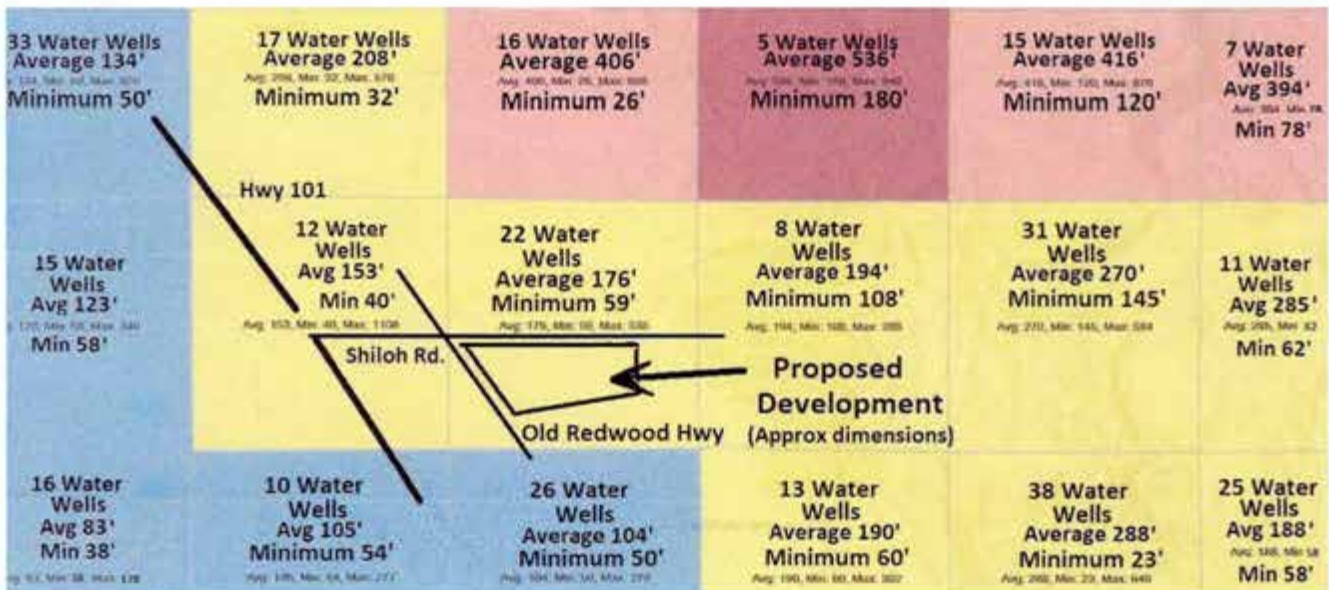
The study stated, “In the vicinity of Windsor...water is present in this shallow aquifer to a depth of about 100 to 400 feet.” **There is not enough depth to provide 700 foot deep wells which will be drilled into mud. That statement is downright fraudulent.**

Understand that aquifers are not like lakes where water flows freely from one side to the other. Water more like “seeps” from one side to the other that takes time to happen. Drastic draws will decrease locally available water.

Based on these data, the following charts show the dire situation with regard to surrounding wells, which as shown here count over 204 local wells shown just in this diagram. Many other wells not shown here will also be affected.



The following diagram shows the dire situation for surrounding wells. The minimum well depths shown here are as low as 23 feet, 26 feet and 32 feet. **There is no question that draws of 170,000 gallons a day will make the shallowest wells and many others run dry.**



Is it fair that this development will force surrounding home owners to lose their water? THE ANSWER IS NO!

THIS SITUATION WOULD BE DISASTROUS AND CANNOT BE MITIGATED!

2.1.1 ROADWAY ACCESS AND CIRCULATION

STATEMENT: "...a new driveway on Shiloh Road across from Gridley Drive."

RESPONSE: We live in the neighborhood on Gridley Drive. Direct access to Gridley Drive will have confused and drunk drivers careening through our quiet neighborhood greatly impacting our quality of life. **This is unacceptable.**

2.1.4 CONSTRUCTION

STATEMENT: "...assumed to occur in one phase beginning in 2026...with anticipated opening day in 2028."

RESPONSE: We live in the quiet neighborhood directly across from Shiloh Road. We are a neighborhood of mostly retired people with many disabled. This construction will mean *hundreds and hundreds* of construction trucks barreling around our neighborhood. Then we will suffer the traffic and pollution of tens of thousands of cars a day. **This will destroy our lives! This is unacceptable!**

THIS SITUATION CANNOT BE MITIGATED!

2.2 ALTERNATIVE B – REDUCED INTENSITY ALTERNATIVE

My response to everything described in this section is identical to Alternative A.

2.3 ALTERNATIVE C – NON-GAMING ALTERNATIVE

STATEMENT: "The estimated average daily water usage for Alternative C would be approximately 19,000 gpd."

RESPONSE: While this is considerably less than the other alternatives, there is no way of knowing impacts on local wells which could still be substantial.

2.1 PREFERRED ALTERNATIVE

STATEMENT: “Alternative A would provide the Tribe with the best opportunity for securing a viable means of attracting and maintaining a longer, sustainable revenue stream...”

RESPONSE: As stated previously in this response:

A tiny tribe of less than 100 claims that they need this proposed casino because of no opportunities for them and they are without funds. **That is false.** Through the state’s Revenue Sharing Trust Fund the Koi Tribe, a tribe of less than 100 people, is allocated \$275,000 every quarter. The Koi have received a total of \$24.4 million since the plan’s inception in 2000, money that they will continue to receive, over one million dollars a year for eternity. There is no need for them to build this casino as there are many other business opportunities for them using that money and the land of this proposed development.

SECTION 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.6.2 ENVIRONMENTAL SETTING

NATIVE AMERICAN CONSULTATION

STATEMENT: “Graton Rancheria responded to the request for information...[who] indicated that the APE is within the ancestral territory of the Southern Pomo people...review indicates that Southern Pomo ancestors were likely on the Project Site and that religious and culturally significant resources are present.”

RESPONSE: In fact, the Graton Rancheria tribe actually located several artifacts that clearly show *their* ancestors lived at the site. To hand over this land to the Koi will clearly defile the sacred claims that Graton makes to this land.

As I stated earlier, it is **highly unlikely that the Koi traveled anyway near the proposed site because their travels would have taken them way out of the way on their travels to the coast** (assuming they even made those travels).

3.7.3.2 ALTERNATIVE A – PROPOSED PROJECT

PROPERTY VALUES

STATEMENT: “Therefore, the Proposed Project likely would not have significant impact on property values.”

RESPONSE: According to a study by the National Association of Realtors, Indian casinos create a negative impact on home values of 4.6% on average.

THIS CASINO IS DETRIMENTAL TO OUR COMMUNITY (ALREADY)

The BIA seems to be entirely ignoring the impacts that this proposed development would have on the surrounding community, most of which is private residential property.

This proposed casino has already had a huge economic impact on our neighborhood. A home on Lea Street located in the neighborhood on the other side of Shiloh Road, two blocks from this proposed project, that was for sale had three offers of purchase; all three were withdrawn when the prospective buyers found out about the proposed casino! **Just the thought of this proposed casino is already having a devastating economic impact on our community.**

This cost that homeowner over one million dollars!

This proves that this hard push for approval is already destroying the surrounding community.

The regulations governing this are:

Off-Reservation Gaming

Off-Reservation Gaming: The Process for Considering Gaming Applications

“Section 20(b)(1)(A), gaming can occur on the land if the Secretary, after consultation with appropriate state and local officials, and officials of nearby tribes, determines that a gaming establishment on newly-acquired land will be in the best interest of the tribe and its members, **and not detrimental to the surrounding community.**”

§ 292.18 “What information must an application contain on detrimental impacts to the surrounding community?”

RESPONSE: It seems obvious that detrimental impact on the surrounding community has not crossed the BIA mind.

THIS SITUATION CANNOT BE MITIGATED!

SOCIAL EFFECTS

CRIME

STATEMENT: “Therefore, with mitigation, the Proposed Project would not result in significant adverse effects associated with crime.”

RESPONSE: This trivializes the impacts of crime on the surrounding neighborhoods. It is a sheer joke to believe Best Management Practices or Mitigation would minimize any crimes!

The Graton casino is located only a few miles from this site. As reported by the Rohnert Park Police Department, the city in which the casino is located, reported crime was about 100 in 2013. The year the casino was completed in 2014 crime jumped to 755. By 2015 and 2016 it **rose to 21% year-over-year** to 925 in 2017 and has likely continued to climb since then. Rohnert Park’s crime rate is 6.57 per 1,000 people vs. 4.4 for California overall. This means that many more people experienced regular crime and violent crime in Rohnert Park than the average Californian which was likely caused by the casino as there is no other source from which this could have happened.

The types of crimes associated with casinos are auto break-ins, burglaries, robbery, assault, drug sales and prostitution.

Clearly the EIS minimizes our concern for crime as an attempt to push crime from people’s minds. As a resident only a few hundred feet from this proposed casino there is no way I would leave my car in my driveway for fear of a break-in, and I would be fearful to take my nightly walk with my wife around our neighborhood for fear of being assaulted or robbed by desperate casino customers in need of money.

THERE IS NO MITIGATION FOR CRIME THIS WILL CAUSE!

GAMING SUBSTITUTION EFFECTS

STATEMENT: “The Dry Creek Band [that operated River Rock casino located only a few miles north of the Site] from operation of Alternative A...would likely cause its facility to close.”

RESPONSE: First, the Dry Creek Band is a local tribe who authentically belongs in the area as their ancestors have occupied this area for centuries, as opposed to the Koi whose homeland is 50 miles away in Lake County.

River Rock Casino which is located 20 miles north of the proposed casino would not have a 24% drop in business as this EIS proposes, **River Rock would go out of business. A native tribe will be totally displaced by a tribe that does not even belong here.** Customers from the Bay Area would stop at this proposed casino rather than drive the additional 20 miles to River Rock which would be a relatively inferior casino compared to this monstrosity. The magnitude of the proposed casino would create draw that would greatly affect Graton Casino as well.

Both the Graton Tribe and the Dry Creek Band are truly indigenous to Sonoma County where their ancestors have lived for centuries. To have an incursion into *their* native lands by the foreigners that are the Koi and the Chickasaw would be unjust and destructive.

STATEMENT: “Should the River Rock Casino operated by the Dry Creek Band cease operations, this would lead to decreased availability and/or quality of governmental services for tribal members.”

RESPONSE: This will lead to the decimation of the tribe who formed a successful casino over two decades ago. The incursion of the Koi onto the Dry Creek native lands will unfairly impact this local tribe both financially and threaten their sovereignty.

It is not fair that the Koi should be allowed to damage the financial means and tribal sovereignty of tribes that clearly have Sonoma County as their homeland

ONCE AGAIN THIS EIS ATTEMPT TO DELUDE US CLAIMING LITTLE OR NO IMPACT TO LOCAL TRIBES WHO ACTAULLY LIVE HERE!

THERE IS NO MITIGATION FOR THIS!

ENVIRONMENTAL JUSTICE EFFECTS TO THE TRIBE

STATEMENT: “The Proposed Project would provide important economic and social benefits to the Tribe by generating revenues needed...”

RESPONSE: As stated before:

Through the state’s Revenue Sharing Trust Fund the Koi Tribe is allocated \$275,000 every quarter. The Koi have received a total of \$24.4 million since the plan’s inception in 2000, money that they will continue to receive, millions of dollars for eternity. Their claim of poverty is nonsense and there is no need for them to build this casino when that money can be used for other ventures that will help them and which will not destroy communities and negatively impact local tribes.

3.10 PUBLIC SERVICE AND UTILITIES

Absent from this Final EIS was a statement made in the previous version of EIS. The question is why? Because these are not pretty words. Because this situation cannot be mitigated!

SOLID WASTE

STATEMENT MADE IN PREVIOUS EIS: “Construction – Construction of the project alternatives could generate quantities or types of waste that cannot be accommodated by regional waste disposal facilities. No mitigation required.”

RESPONSE: No mitigation required? Question: Where is that waste going? If this EIS was truthful it would tell us where that waste would be going. Here “No mitigation required” says “We don’t know” or “We know but we will not tell you.” The question is: Will they simply dump that toxic waste on the land poisoning that land for eternity? And who will be there to stop them?

THERE IS NO MITIGATION FOR THIS!

Again, this was in the previous version of the EIS but has been excluded in this version. The question is why? Because these are not pretty words and this situation cannot be mitigated!

OPERATION

STATEMENT MADE IN PREVIOUS EIS: “Operation of the project alternatives could generate quantities or types of waste that cannot be accommodated by regional waste disposal facilities. No mitigation required.”

RESPONSE: No mitigation required when there is no stated answer? Once again, “No mitigation required” says “we don’t know.” Again the question is: Will they simply dump that toxic waste on the land poisoning that land for eternity? And who will be there to stop them?

THERE IS NO MITIGATION FOR THIS!

3.9.3 IMPACTS

3.9.3.2 ALTERNATIVE A – PROPOSED PROJECT

LAND USE CONFLICTS

STATEMENT: “The areas immediately adjacent to the Project Site are developed with residential, recreational, commercial, and agricultural uses...Alternative A would not physically disrupt neighboring land uses...While the proposed uses within the Project Site are not similar in nature to the uses immediately surrounding the site, they are consistent with large scale commercial uses approximately 0.3 miles to the northwest, including big box stores and other high intensity commercial uses...”

RESPONSE: The areas immediately adjacent to the site houses thousands of people, a park, two churches and hundreds of homes. There is no question that this development would destroy the neighboring land usage and the people’s rights to a tranquil existence. There is a Home Depot and a Walmart. To compare this proposed project through which hundreds of cars pass each day is **absurd!** There is absolutely no comparison to this proposed project which will draw tens of thousands of cars with their noise and pollution and massive traffic jams to the existing situation. **To make this comparison is absurd!**

THERE IS NO MITIGATION FOR THIS!

3.12.2 ENVIRONMENTAL SETTING

WILD FIRE

STATEMENT: "...analysis of a future evacuation event is inherently speculative."

REPOSENSE: The following shows in detail that wildfires are very real and that the notion that evacuation is "speculative" is insulting.

THE DIAGRAMS SHOWN IN THIS EIS CONCERNING WILDFIRES ARE DELIBERATELY INCOMPLETE AND MISLEADING!

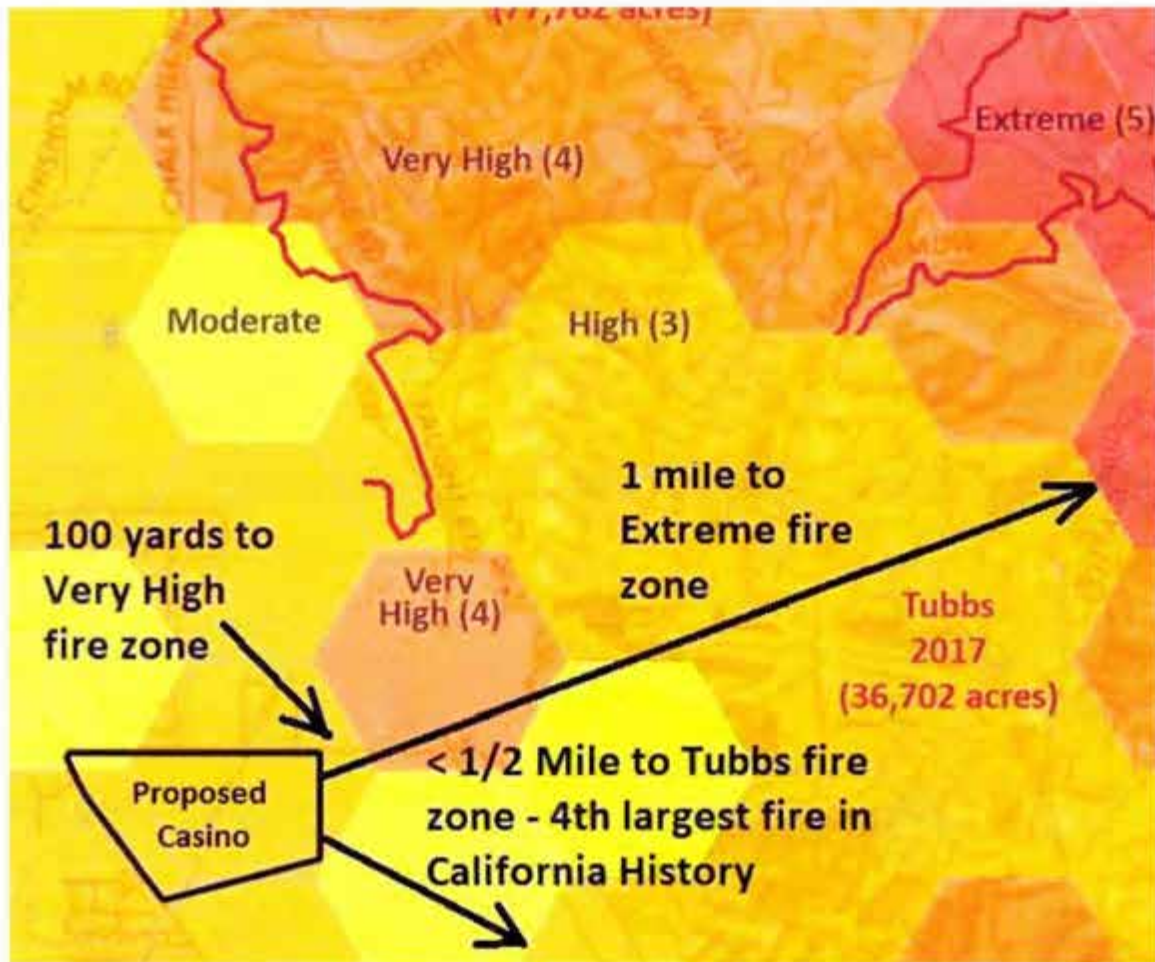
There are lots and lots and lots of words describing something that the author clearly has no idea what it is like to actually be near a wild fire. The sheer panic that races through your mind when you have a sheriff knocking on your door telling you that you have **five minutes to leave** has happened to me and my family – twice!

There is little to extract from those many, many words in the EIS, but there are plenty of facts regarding wild fires which I show here.

Evacuation Impacts Due to Wildfire

THE DIAGRAMS SHOWN IN THIS EIS ARE INCOMPLETE AND MISLEADING!

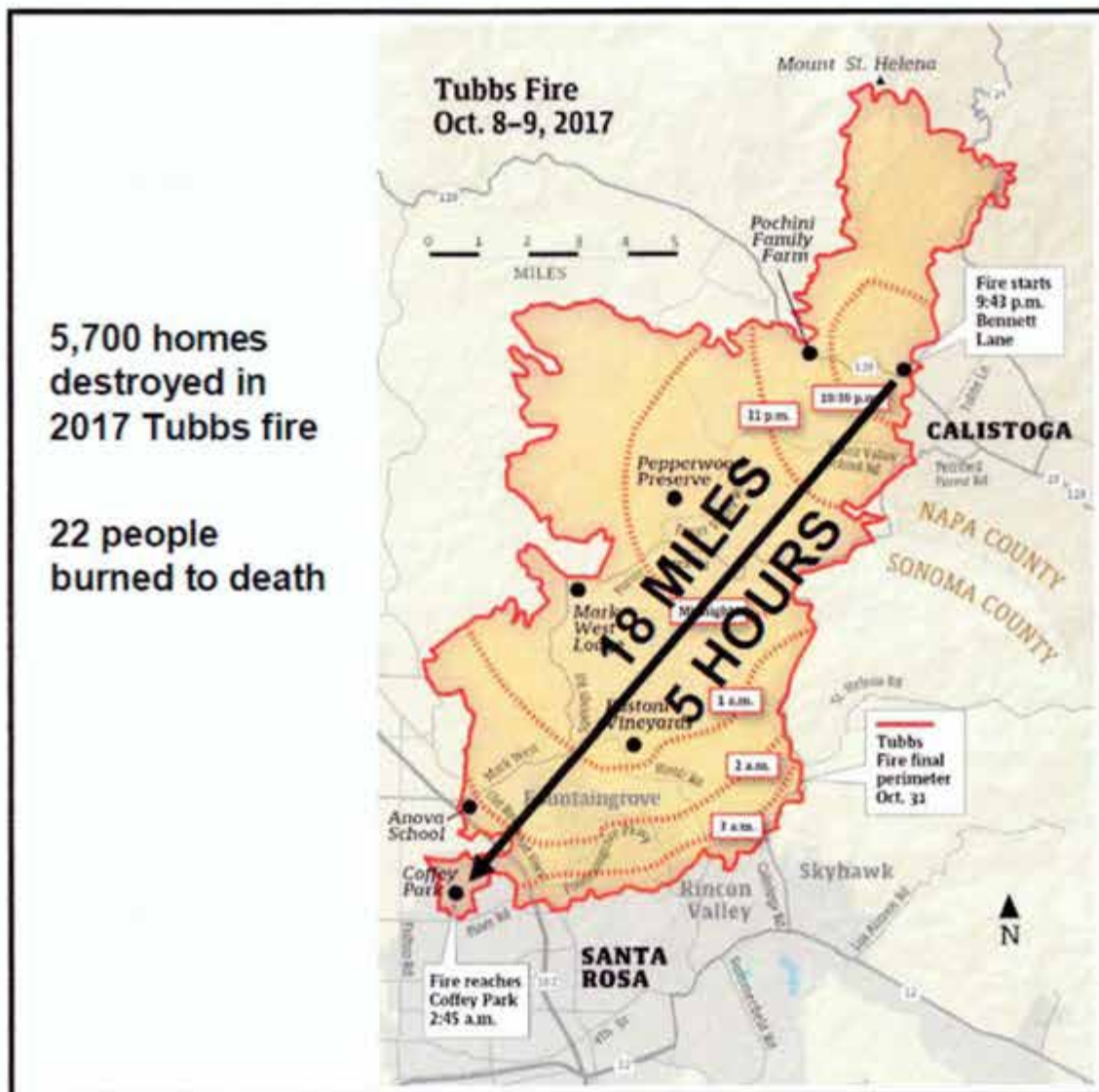
This map came from the previous EIS, FIGURE 3.12-2 which I annotated.



Using the EIS's own maps we can clearly see the reality of wild fires for this proposed casino. That site is only 100 yards from a Very High fire zone. It is only 1 mile to an Extreme fire zone. And it is less than one-half mile from the Tubbs fire zone – at the time the fourth largest fire in California history!

This map shows the Tubbs zone as High Fire zone when the Tubbs Fire zone contained the fourth largest fire in California history! **That is not a High Fire Zone, it is an Extreme Fire Zone – it contained the Tubbs fire! This is yet another attempt by this flawed EIS to delude us.**

This map below shows the path of the Tubbs fire in 2017. The enormous swath covered a width of 8 miles and length of 25 miles in total including the fire that burned away from the direction of Santa Rosa. This fire destroyed 5,700 homes. Huge neighborhoods laid to ashes. **22 people were destroyed as they were burned alive – the most horrible death imaginable!**



5,700 homes destroyed in 2017 Tubbs fire

22 people burned to death

ALL IN 5 HOURS!

In 1997 the Tubbs fire, which originated in Napa county, 18 miles away and over a mountain range away destroyed 5,643 buildings including entire very large neighborhoods only four miles south from this site in five hours. That fire originated 18 miles away – a long distance and came over a ridge with Mount Saint Helena, elevation 4,342 feet, barreled down the mountain's west side taking out whole neighborhoods, jumping a 200-foot wide freeway to destroy a large K-Mart store, Applebees, a Chevron gas station and over 1,500 more homes. People died with 22 people burned to death, some in their cars. **Make no mistake, those 22 people died the most excruciating death possible – burned alive!**

A total of 5,700 homes were lost in the Tubbs fire. The city of Santa Rosa, located 60 miles north of San Francisco lost 1,600 homes in Fountain Grove, over 1,500 homes in the Coffey Park area and 600 homes in Lakfield-Wikiup. Santa Rosa lost 5% of its homes in only a few hours.

The only thing that saved our home from that fire was the miraculous shift in winds that blew the fire away from us, although homes a few hundred yards away went up in flames. If the wind had not suddenly shifted our homes would have also been destroyed. We experienced horror as the Tubbs fire came within a few hundred yards of our home. Standing on Shiloh Road, a road that borders the proposed casino, watching a wall of flame careening down the mountain, so close we could feel the heat on our faces!

The Tubbs fire was the fourth largest wildfire in California history!

In 1999 the Kincadee fire destroyed 374 structures and thankfully there were no fatalities. That fire originated nearly 10 miles north of the site and came within hundreds of yards of the proposed Koi development. Both the Tubbs fire and the Kincadee fire clearly threatened this proposed site.

It is worth noting that in November 2024 (now) there were 2 wildfires near the Site, one within one mile. Wild fires are not some kind of imagined thing. THEY ARE REAL!

If you have never had a wildfire barreling down the mountainside heading toward your home you have no idea of the panic, terror and helplessness that overwhelms you.

THE OCCURRENCE OF ANOTHER DEVASTATING WILDFIRE IS NOT IF, BUT WHEN.

This Final EIS states that in the event of wild fire that evacuation will take evidently take only microseconds.

However, this EIS, Section 2.1.2 says that we can expect 5,119 cars in the parking lot. Section 3.12.2 says this can be done in 300 minutes. In addition, as stated in Section 3.7 there will be as many as 1,859 employees. When we add their exits in the case of wildfire we have 6,978 cars exiting.

A sane calculation says that with 6,978 cars at 5 seconds per car it will take 9 hours 42 minutes. That assumes no accidents with the attendant road rages and courteous drivers who actually drive sanely. We are humans and we know that humans can behave poorly – especially when they look up at the mountain and see a fire barreling down to kill them!

REMEMBER THE TUBBS FIRE WENT 18 MILES IN 5 HOURS!

Tubbs fire, 22 people? If this casino is allowed to be built **hundreds or thousands of people would suffer the most horrible death as they are burned alive. MANY IN THEIR CARS!**

THERE IS NO “SPECIAL MANAGEMENT PRACTICE” THAT CAN SAVE THOSE LIVES. THERE IS NO “MITIGATION” THAT CAN SAVE THOSE LIVES.

This is a huge deficiency in this EIS that attempts to fool us into believing that there is any way this can be solved. **There is no way any EIS can solve this. Nothing can solve this!**

When (not if) a wildfire comes and many lives are lost because the BIA approved this horribly flawed casino project despite the thousands of pages of opposition THE BIA WILL BECOME HISTORY. There are many Federal agencies that can manage the tribes without the bias the BIA shows toward the tribes in what should be management of the tribes within the boundaries of the positive general public good. That is clearly not the case here.

The EIS plan for evacuation is downright fraudulent and cannot be fixed, try as hard as they might. The reality is that deadly wildfires and the excruciating deaths they cause can never be fixed with words.

You cannot “fix” wildfires with words. You cannot “fix” wildfires with a horribly written EIS that makes promises it cannot deliver.

This applies to all proposed alternatives for this development. No development would be exempt from wildfire risk. **NONE!**

THERE IS TOO MUCH TO LOSE!

That huge outflow of cars from the casino will clog the roads and we who live just across the street will be trapped in our neighborhoods. **WE WILL DIE!**

***TO MINIMIZE THE RISK OF WILDFIRES IN THE EIS IS DELUDED.
THERE IS NO MITIGATION FOR WILD FIRES!***

3.14.2 WATER SOURCES

SURFACE WATER

Cumulative Effects to Domestic Wells in Shallow and Intermediate Zones

ONCE AGAIN, THE DIAGRAMS SHOWN IN THIS EIS ARE DELIBERATELY INCOMPLETE AND MISLEADING!

STATEMENT: "...determine that the maximum cumulative draw downs at the hypothetical nearest possible domestic well location to the Project Site are predicted to be 5.91 feet for the shallowest reported well depth, and 9.08 feet for the average reported well depth."

RESPONSE: This was discussed extensively in this response before. The fact is there is no difference between shallow wells and other wells because all will experience the same draw-down. The other fact is that the actual impacts to wells is unknown and can only be guessed at. As stated in this EIS, "Alternative A would contribute to potentially cumulatively significant impacts related to interference drawdown in shallow wells and degradation of GDEs during dry years."

As also stated earlier, this development is in the shallow side of the Santa Rosa aquifer plane and so it is anybody's guess if this proposed water plan would even work.

The bottom line is that this development would be catastrophic to surrounding homeowners with wells.

SUMMARY

STATEMENT: “Alternative A would contribute to potentially cumulatively significant impacts related to interference drawdown in shallow wells and degradation of GDEs during dry years.”

RESPONSE: As the diagrams above show, there are many local water wells that are susceptible to draw downs, especially in dry years. We have had strings of dry years that have lasted up to five years demanding citizens to conserve everyday water usage – shortened showers and our lawns going brown. Clearly, the use of the wells as described here could make many well users have to drink dirt!

THERE IS NO MITIGATION FOR THIS!

3.14.3 AIR QUALITY

STATEMENT: “Operation of the project alternatives would result in the generation of mobile emissions from patron, employee, and delivery vehicles...”

RESPONSE: “Mitigation” would not fix the hundreds and hundreds of dump trucks and other trucks passing with their tons of diesel fumes within a few hundred feet of residential housing for upwards of two years. Nor would it solve the constant daily pollution from dozens of delivery trucks and tens of thousands of cars once the proposed casino opens.

***THERE IS NO MITIGATION FOR THE POLLUTION
THIS PROJECT WILL PRODUCE AND THE DESTRUCTION
TO THE HEALTH OF THE LOCAL POPULATION!***

3.14.7 TRANSPORTATION AND CIRCULATION

STUDY INTERSECTIONS

STATEMENT: “...widening of Shiloh Road...”

RESPONSE: First, we are treated to a “word salad” that makes determining the exact plans nearly incomprehensible. **This project would require the widening of roads which would demand the destruction of existing homes and those homeowners forced to move, often when they have occupied their homes for decades.**

Highway 101, one mile to the west is a 6 lane freeway that squeezes to 4 lanes one mile north of the Shiloh Road turnoff.

The only way traffic to the proposed casino could be facilitated is by widening Shiloh Road and Old Redwood Highway which is in no way possible without destroying homes.

The descriptions contained in the EIS concerning road alterations contained in this entry is so deliberately cryptic that it is nearly impossible to understand! The best one can tell is that they would intend to widen both Old Redwood Highway and Shiloh Road by many lanes. There is just one problem: Homes are located close to both roads. This map shown in the EIS tells the story with my annotations about the location of homes, parks and churches. The widened Shiloh Road is in the original diagram, other annotations are there for clarity in this discussion.



Again, the wording in the EIS concerning road widening is deliberately confusing, and how they would intend to accomplish this. It should have stated simply:

- How many lanes will Shiloh Road be?
- How many lanes will Old Redwood Highway be?
- How many homes will have to be destroyed?
- How many people will be forced to move from homes they have lived in for decades?

THIS SHOWS THE EIS IS DELIBERATELY WORDED TO CONFUSE US HOPING, JUST HOPING THAT WE WILL OVERLOOK THIS VERY IMPORTANT NEIGHBORHOOD THREAT.

This EIS description nowhere says that 16 homes would have to be destroyed along Shiloh Road. Concerning widening Old Redwood Highway, immediately across the street from the proposed project there is a church and three homes. Also, there is a 138 unit mobile home park for seniors and disabled homeowners. If this project is approved that would mean potentially dozens of homes would be destroyed and hundreds of elderly and disable people will be forced to move. There is also a very large apartment building at the corner of Shiloh Road and Old Redwood Highway and another closer to Highway 101 that will be impacted. **Should people lose their homes because of a casino? Is that fair? NO!**

THERE IS NO MITIGATION FOR THIS!

3.14.8 LAND USE

STATEMENT: "If taken into federal trust, the Project Site would generally not be subject to local jurisdiction..."

RESPONSE: The fact of matter is that if this land is taken into federal trust on behalf of the Koi they will not be answering to *anybody* about *anything*. They will be free to do as they please without the ability of any government agencies to override them. **This means that for people who live near this catastrophe will have no say as our lives are destroyed by something that did not need to occur.**

IF THIS OCCURS THERE WILL BE NO MITIGATION EVER!

SECTION 3.15.3 GROWTH INDUCING EFFECTS

STATEMENT: "...it is assumed that employment for Alternative A would be filled by the local populace."

RESPONSE: The unemployment rate in Sonoma County is currently less than 4% while for the state of California it is currently 5.5%. The fact is that 4% unemployment means that the workforce is nearly fully employed. This means there is very little local labor available for this proposed casino. Graton casino reports that they have dozens of open positions due to lack of qualified candidates. The existence of this casino will not magically make more workers available, and drawing employees from out of the area will have negative impacts on housing.

THERE IS NO MITIGATION FOR THIS

SECTION 4 MITIGATION

Keeping in mind how many times I stated that there is NO MITIGATION for the items discussed in this presentation, these statements of mitigation are superfluous. However, given their presence I will address them.

STATEMENT: “Avoiding the adverse effect altogether by no taking certain action of parts of an action.”

RESPONSE: The term “THERE IS NO MITIGATION” states clearly that *any action* will be adverse.

STATEMENT: “Minimizing the adverse effect by limiting the degree of magnitude of the action and its implementation.”

RESPONSE: Any action taken when there is “NO MITIGATION” states that there is no degree of magnitude, even a minimal degree of magnitude, that will not be adverse.

“THERE IS NO MITIGATION” MEANS THERE IS NO MITIGATION

RESOURCE AREA: WATER RESOURCES

The verbiage in this section alludes to the EIS’ ability to magically eliminate impact on water resources. As previously described in great detail addressing section 3.14.2 WATER SOURCES, SURFACE WATER there is no mitigation for the risk to surrounding wells. The fact is that the actual impacts on the surrounding wells is unknown and the data used to describe those impacts are pure speculation and guess work.

The described mitigation of water shown here is meaningless when compared to the data that I have shown before.

THERE IS NO MITIGATION FOR THIS!

CULTURAL RESOURCES

STATEMENT: "In the event of any inadvertent discovery of prehistoric or historic archeological resources..."

RESPONSE: There is no "inadvertent" here. The fact is that remnants of the local tribes' ancestors have already been located on the site, part of which has led to the current need to leave this proposed site undisturbed because the claim for local tribes to this land as a heritage site should be honored.

THERE IS NO MITIGATION FOR THIS!

TRANSPORTATION AND CIRCULATION

STATEMENT: *There are several statements regard changes to the surrounding roadways.*

RESPONSE: I have covered this extensively in my response to 3.14.7

TRANSPORTATION AND CIRCULATION, STUDY INTERSECTIONS.

While the destruction of homes and dislocation of residents, many who have lived in their homes for decades, may seem trivial to the scope of this EIS, IT IS NOT TRIVIAL. While it would be worth duplicating what I stated previously, I will instead refer you to what has already been stated above.

THERE IS NO MITIGATION FOR THIS!

HAZARDOUS MATERIALS AND HAZARDS – WILDIRE HAZARDS

STATEMENT: *There are various statements made here that are highly repetitive of the misstatements and lack of clear information before.*

RESPONSE: I covered this extensively in my response to section 3.12.2

ENVIRONMENTAL SETTING, WILD FIRE. As I showed there the threat of wildfires is very real with the recent history including the incredible destruction and loss of lives. For this section to attempt in any way to minimize this is absurd. As I stated before, no words can save homes and lives, certainly not as described in this EIS which attempts to make the incredible dangers of wildfires simply disappear with words.

THERE IS NO MITIGATION FOR WILDFIRES!

CONSULTATION AND COORDINATION

STATEMENT: *Many agencies and resources names are quoted here.*

RESPONSE: This section attempts to use the argumentative fallacy of “appeal to authority” to convince the reader that all these so-call consulting agency “authorities” have studied and endorse this EIS. **This is nonsense and deliberately misleading.** This appeal to authority does not give this EIS any additional authority as it is clear that the Tribe will do as it pleases once this land has gone into trust. And the truth of the matter is that once that land has gone into trust there is virtually nothing any of the agencies cited here – or anybody else – can do anything about. That was previously stated in this EIS, “If taken into federal trust, the Project Site would generally not be subject to local jurisdiction...” or any jurisdiction!

The citation of these “authorities” has been used as a “ruse” to convince the reader of this EIS’ validity which it does not have.

THESE CITATIONS DO NOT CHANGE THE FACT THAT THERE IS NO MITIGATION!

As shown in this response the Koi must **not be allowed to proceed** with this development for all the reasons stated. **This project was ill conceived and based purely on greed** despite the fact that the Koi has received \$24 million in Casino Trust funds since 2000. **The BIA is showing no regard for the well-being of the local indigenous tribes or the community this project would destroy.**

The BIA seems determined to approve this proposed development on a fast-track basis having deliberately bypassed the steps required by law to consult with local tribes long before this stage of this particular proposed project was reached and to disregard the surrounding community well-being. The BIA has broken the law by not following the law and defied common practices that have been in place for over a century.

Has the BIA stooped to corruption to move this project forward as quickly as possible?

Does BIA’s deliberate disregard for the law and its clear favoring of the Koi amount to corruption?

In my opinion this is a big fat YES!

Unless the BIA wishes for the public to learn about the extreme corruption of the BIA, they will take the enormous push-back to heart and will heed the writing contained here and the thousands of other pages showing the enormous push-back from the community that clearly shows the Koi does not belong in Sonoma County among the many other concerns raised here.

The Koi homeland is Lake County.

If the BIA permits this project it would allow any tribe anywhere to purchase property, declare it their homeland and build a casino no matter how badly it would threaten the lives of innocent people, destroy a community and have no concern for how it impacts native tribes who have the right to their homeland. They would be free to disregard the laws and build a casino on every corner in America.

Your next door neighbor could be a casino next year!

THIS IS AN EXTREMELY DANGEROUS PRECEDENT THAT WILL THREATEN EVERY COMMUNITY EVERYWHERE IN THE UNITED STATES, EVERY CITIZEN IN THE UNITED STATES!

THIS IS AN EXTREMELY DANGEROUS PRECEDENT!

THERE ARE FOUR SPECIFIC REASONS WHY THIS CASINO PROJECT MUST BE REJECTED:

**WILDFIRES, WATER, NOT KOI HOMELAND,
DANGEROUS PRECEDENT**

**HOW MANY WAYS DO WE NEED TO SHOW THAT
THE KOI DO NOT BELONG IN SONOMA COUNTY?**

**HOW MANY METHODS MUST WE NEED TO USE
TO HAVE THE BIA NOT APPROVE THIS PROJECT?**

**HOW MANY WORDS DO YOU NEED TO SEE HOW THAT APPROVAL
WILL DESTROY THIS COUNTRY?**

THIS PROJECT MUST BE REJECTED NOW!

END OF RESPONSES TO FINAL EIS

Attachments

- **Letter from Gavin Newsom, Governor of California in opposition**
- **Letter from California Congressmen Jared Huffman and Mike Thompson in opposition**
- **Letter in opposition to Restored Lands Determination**

**LETTER IN OPPOSITION FROM CALIFORNIA
GOVERNOR GAVIN NEWSOM**



OFFICE OF THE GOVERNOR

August 16, 2024

Bryan Newland
Assistant Secretary – Indian Affairs
U.S. Department of the Interior 1849 C
Street, N.W., MS-4660-MIB Washington,
D.C. 20240

Re: Shiloh Resort and Casino Project (Koi Nation of Northern California) Scotts Valley
Casino and Tribal Housing Project (Scotts Valley Band of Pomo Indians)

Dear Assistant Secretary Newland:

On behalf of Governor Gavin Newsom, I write to urge the U.S. Department of the Interior not to move forward with the Shiloh Resort and Casino Project in Sonoma County and the Scotts Valley Casino and Tribal Housing Project in Solano County.

Governor Newsom and his Administration are grateful for the opportunity to share our perspective on these projects, as we are grateful to the Department for its thoughtful and constructive engagement in a wide range of other contexts. Our concerns about these specific projects, and their specific procedural pathway, should not be understood as a criticism of the Department's broader practice of taking land into trust for tribal governments— including, in appropriate cases, the Department's practice of (and time-tested procedures for) taking land into trust for gaming. The Governor recognizes the important role that this practice can play in supporting tribes' political sovereignty and economic self-sufficiency.

At the same time, however, caution is warranted when considering the potential expansion of gaming to land that is not currently eligible for gaming. This is particularly true in California, where the voters who legalized tribal gaming were promised that such gaming would remain geographically limited. This historical context underscores the importance of striking a careful balance between the potential benefits of expanded tribal gaming and its potential impacts on surrounding communities.

Federal law contains important safeguards that have previously helped the Department strike this delicate balance. As a starting point, federal law generally prohibits gaming on new land taken into trust for a tribe, unless the land is linked to the tribe's preexisting reservation. 25 U.S.C. § 2719(a). The principal exception to this rule carefully safeguards local interests (including the interests of local tribes), allowing gaming only where the Department has determined not only that such gaming would be in the best interest of the gaming tribe, but also that it "would not be detrimental to the surrounding community"—and only where the relevant state's governor concurs in that determination. 25 U.S.C. § 2719(b)(1)(A). Governor Newsom discharges this responsibility with the utmost care, and has previously exercised this power in a manner that supports both tribal self-sufficiency and the interests of surrounding communities. *See, e.g.*, Letter from Governor Gavin Newsom to Bryan Newland, Assistant Secretary – Indian Affairs (June 13, 2022). The Governor appreciates the opportunity to engage in this important process, which appropriately balances the sovereign interests of states and tribes.

Here, however, the Governor is concerned that the Department might depart from this familiar procedure and its important safeguards. In their current form control over its aboriginal homeland. Care must be taken, however, to ensure that this "restored lands" exception—like all exceptions—remains within appropriate limits. The "restored lands" exception must not be construed so broadly as to "give restored tribes an open-ended license to game on newly acquired lands." *Redding Rancheria v. Jewell*, 776 F.3d 706, 711 (9th Cir. 2015). On the contrary: "In administering the restored lands exception, the Secretary needs to ensure that tribes do not take advantage of the exception to expand gaming operations unduly and to the detriment of other tribes' gaming operations." *Id.*, these two projects propose to rely on a different statutory provision that allows gaming on land taken into trust—without a two-part determination or the Governor's concurrence—as part of "the restoration of lands for an Indian tribe that is restored to Federal recognition." 25 U.S.C. § 2719(b)(1)(B)(iii). Make no mistake: the Governor recognizes the profound moral value of restoring a tribe's.

As explained below, neither of these two proposed projects fits within the limits of the "restored lands" exception.

As to the Shiloh Resort and Casino Project, the Koi Nation of Northern California lacks sufficient historical connection to the Windsor parcel to support the "restored lands" exception. The Windsor parcel does not fall within the Koi Nation's aboriginal homeland: it lies approximately fifty miles, over winding mountain roads, from the Lake County region where (as the Koi Nation acknowledges) "the Koi Nation's ancestors had villages and sacred sites along the shores of Clearlake since time immemorial." Koi Nation's Opening Brief at 11, *Koi Nation of Northern California v. City of Clearlake*, No. A169438 (Cal. Ct. App. Apr. 30, 2024). The assertion that the Koi Nation sometimes used trade routes or otherwise obtained resources near modern-day Windsor cannot change this basic fact: such transient uses do not show the kind of sustained, durable presence that would be necessary to support the view that the proposed project represents a "restoration." Nor can it matter that individual members of the Koi Nation voluntarily resided in Sonoma County during the twentieth century. If the presence of individual members in modern times were conflated with a tribe's control over its aboriginal homeland, for purposes of the "restored lands" exception, the exception could swallow the rule—which, as the Ninth Circuit has warned, it must not do. *See Redding Rancheria*, 776 F.3d at 711.

The Scotts Valley Casino and Tribal Housing Project raises similar concerns.

Like the Koi Nation, the Scotts Valley Band has its aboriginal homeland in modern-day Lake County. Like the Koi Nation, the Scotts Valley Band lacks the deep and enduring connection to the relevant territory (here, the Vallejo parcel) necessary to invoke the “restored lands” exception. And here again, the nearby presence of specific individuals, late in history, must not be conflated with the Tribe’s collective control over its aboriginal homeland. Nor can an 1851 treaty—apparently purporting to cede a vast swath of the North Bay, Sacramento Valley, and Clear Lake regions—produce a different result. *Cf.*

Scotts Valley Band of Pomo Indians v. Dep’t of the Interior, 633 F. Supp. 3d 132, 168 (D.D.C. 2022). Nineteenth-century treaties were hardly models of respect for tribal sovereignty, and one cannot safely assume that they accurately reflect the boundaries of tribes’ aboriginal homelands.

The Department’s interpretation of the “restored lands” exception further counsels against applying that exception to the Scotts Valley project. The Department has construed the “restored lands” exception to require one or more “modern connections” between the tribe and the land. 25 C.F.R. § 292.12(a). In the context of the Scotts Valley project, no such modern connection is apparent. On the contrary, the Environmental Assessment appears to recognize that the Scotts Valley Band has no presence in Solano County: the Environmental Assessment notes that the Band’s members “span[] across Alameda, Contra Costa, Lake, Mendocino, and Sonoma Counties,” while omitting any reference to Solano. *Envtl. Assessment* at 1-2. Under the Department’s view of the “restored lands” exception, embodied in its regulations, this lack of “modern connections” provides an additional reason not to use the exception to proceed with the Scotts Valley project.

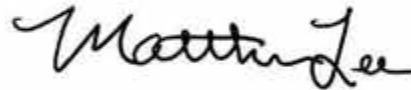
Nor can the so-called “Indian canon” stretch the limits of the “restored lands” exception to encompass these two projects. *Cf. Scotts Valley Band*, 633 F. Supp. 3d at 166–68. Although that canon sometimes allows statutory ambiguity to be resolved in favor of tribal sovereignty, it has no application where—as here—“all tribal interests are not aligned.” *Redding Rancheria*, 776 F.3d at 713. “An interpretation of the restored lands exception that would benefit [a] particular tribe, by allowing unlimited use of restored land for gaming purposes, would not necessarily benefit other tribes also engaged in gaming.” *Id.* Here, other local tribes—tribes who truly have called the relevant lands home since time immemorial—are steadfast in their opposition to these projects. “The canon should not apply in such circumstances.” *Id.*

Finally, misplaced reliance on the “restored lands” exception, in the context of these two projects, also risks leading the Department astray under the National Environmental Policy Act. As explained above, the Windsor parcel and the Vallejo parcel fall far outside the aboriginal homelands of the Koi Nation and the Scotts Valley Band, respectively. In focusing on those two parcels, the Department has thus far failed to consider whether the purposes of the proposed projects could be served by sites within the Tribes’ aboriginal homelands—which is to say that the Department has, thus far, failed to adequately consider reasonable geographic alternatives as required by NEPA. See *Ilio’ulaokalani Coal. v. Rumsfeld*, 464 F.3d 1083, 1097–1101 (9th Cir. 2006).

Governor Newsom has deep respect for tribal sovereignty, and he has been proud to restore tribes' control over lands from which they have been dispossessed. Here, however, he is concerned by the prospect that the Department might invoke the "restored lands" exception to support projects that are focused less on restoring the relevant tribes' aboriginal homelands, and more on creating new gaming operations in desirable markets. If the Department were to embrace this view of the "restored lands" exception, it is far from obvious that the "exception" would retain a clear and durable limiting principle. This prospect is particularly troubling in California, where the voters who approved tribal gaming were promised that such gaming would remain carefully limited—including by federal law and its geographic restrictions on the categories of land open to gaming.

Governor Newsom is committed to working with tribal governments, and the Department, to support tribes' self-determination and economic development. In appropriate cases, the Governor stands ready to exercise his authority, under federal law, to concur in the Department's decision to take land into trust for gaming. Here, however, he is concerned that these specific projects are proceeding in a manner that would sidestep the State, ignore the concerns of tribal governments and other local communities, and stretch the "restored lands" exception beyond its legal limits—while failing to adequately consider whether there might be a better way. On behalf of the Governor, I urge the Department not to move forward with these proposed projects.

Sincerely,

A handwritten signature in black ink that reads "Matthew Lee". The signature is written in a cursive, flowing style.

Matthew Lee
Senior Advisor for Tribal Negotiations & Deputy
Legal Affairs Secretary
Office of Governor Gavin Newsom

**LETTER IN OPPOSITION FROM
CALIFORNIA CONGRESSMEN JARED HUFFMAN AND
MIKE THOMPSON**

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 Member of Congress



Mike Thompson

Letter in opposition to Restored Lands claim

Our Community Matters
An Association of Neighbors in Sonoma County, CA

3828 Matilde Drive
Windsor, California 95492

Telephone: (707) 293-4719
Email: ourcommunitymatters2@gmail.com

October 30, 2021

Via U.S. Mail and Email

Email Address: IndianGaming@bia.gov

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-county/>.

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

⁵See <https://www.koinationsonoma.com/history/>.

⁶See <https://www.koinationsonoma.com/history/>.

⁷See https://windsor-ca.granicus.com/MetaViewer.php?view_id=28&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.⁹ 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

⁹ See <https://www.timesheraldonline.com/wp-content/uploads/2019/08/DOI-Letter-Scotts-Valley-Restored-Lands-Decision-re-Vallejo-2-7-2019-1.pdf>

¹⁰ 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.

¹¹ 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/?slide=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

2021100185

Docu-

GRAND

ir. Ct

Ndli

RETO

MAIL TAX STATEMENTS AS DIRECTED ABOVE

APR 2004 (Rev. 10-20-03)

GRAND DEED

ATTORNEYS AT LAW

[Redacted line]

... C20, Room 1000, 1000 ...

BY Ath - S. L. ...

BY [Signature]

[Signature]

WITNESSES

September 1, 2011 before me, Carol Kinnick, County Clerk,
 State of California, and one of the officers,
 of the County of San Diego,
 duly sworn, Randall C. Clifton and Sydney A. Clifton
 appeared to me on the basis of satisfactory evidence to be the persons whose names are subscribed to the
 foregoing and acknowledged to me that they had executed the same in full and free voluntary and lawful
 manner, and that they were not under any legal disability at the time of the execution of the same, and that the
 contents of the instrument were true and correct.

I, under PENALTY OF PERJURY under the laws of the State of California, do hereby certify that the foregoing is true and
 correct.

 County Clerk

[Seal]

[Redacted area]

000112 and 000113 1994-2013

SAMPLE A
Agri-Debris

IR spectrum of the sample

Agri-Debris (1994-2013) and 000113 1994-2013 (IR spectrum)



Wavenumber (cm⁻¹) vs. Transmittance (%)

Agri-Debris (1994-2013) and 000113 1994-2013

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_0e7ade2-2871-11ec-93c3-536857a5e1cf.html and not verified by Our Community Matters.

Attachment 3

Locations of Recent Wildfires (Since 2015)



From: Tom Schiff <schiff.tom@gmail.com>
Sent: Friday, December 20, 2024 4:41 PM
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.

The neighbors are against it, the city of Windsor is against it, the county is against it, the state is against it and local congressmen are against it.

That, for starters, should tell you something.

I read the report. Many of the findings of limited to no effect on various aspects of the local community are ridiculous.

This is casino / reservation shopping pure and simple -- regardless of the detriment to local citizens. This proposed project would not be used for anything other than a money pump -- financed and operated by out of state interests. Does that sound like a "reservation"? No

To say the Koi tribe is connected to this land is patently untrue.

For safety reasons alone, this project should be denied. I lived through the 2017 Tubbs Fire. Our home burned to the ground and we lost absolutely everything. In the mad dash to get out of our home, I didn't even get my wallet, or clothes other than the t-shirt I was wearing. This is no joke. I've seen this wildfire disaster movie up close and personal. We were lucky to get out alive.

Safely evacuating the local neighborhood residents and a casino / hotel full of people on the narrow artery roads -- ain't gonna happen. Those local roads will not handle the increase in traffic. let alone a mad rush to evacuate traffic. We were on highway 101 trying to evacuate when the CHP closed the freeway due to flames whipping across the road. That happens in the proposed project area and a lot of people will die.

There will also be the strain on local water, sewer and power utilities. These will not be insignificant.

Again, for great reasons this project should be terminated. We have enough casinos. This will add nothing positive to the local community. It's only a payoff to the Koi tribe.

Thomas E. Schiff
3930 Hansford Court
Santa Rosa, CA 95404
(714) 745-1360

From: kimberlee keller <kimberleekeller72@gmail.com>

Sent: Friday, December 20, 2024 5:05 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Please Don't Approve the Koi Nation Windsor, CA Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Sir; As a long time resident, I am writing to urge the BIA to NOT APPROVE the Koi Nation Casino Project near Windsor. There are many reasons:

1. The Casino would be in lovely farmland but close to already crowded highway corridors. It would increase traffic, noise and crime in our community.
2. It will cause environmental harm.
3. The land is far from the Koi Nation's aboriginal territory--its a fraudulent petition in this regard.

There is widespread opposition to this Project. From the community, and our federal, state and local political leaders.

DO NOT APPROVE THIS PROJECT!

Sincerely, Kimberlee Keller
477 Eleanor Ave, Sebastopol CA
kimberleekeller72@gmail.com

From: Michael Krikorian <thekriks@sonic.net>
Sent: Friday, December 20, 2024 5:19 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation casino project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

I am writing in regards to the application for a permit by the Koi Nation in Northern California to build a casino resort in Sonoma County. I have lived in Sonoma County for the past 53 years and in the town of Windsor for the past 14 years. The town of Windsor is the town nearby the proposed casino project. I am opposed to the siting of such a massive development in the area they have chosen. Directly across the street from the eastern edge of that property is the start of a wilderness park called Shiloh Ranch Regional Park. That park is a very special place that I have frequented several times a month for years now. It is a refuge for our citizens and our wildlife and means a lot to a lot of people. This massive casino resort complex is completely out of character with that area.

Another issue is the social impact of a gambling casino in our area. Sonoma County already has 2 large Indian casinos. I believe one more is one too many. I grew up in Las Vegas, Nevada and experienced living in a town dominated by gambling. It does impact the local society in terms of how people spend their time and money and then the spinoffs of that way of life. I don't believe that one more casino would add to the local social structure.

Thank you for your serious consideration of these issues.

thank you,

Michael Krikorian

738 Willowood Way

Windsor, CA 95492

thekriks@sonic.net

From: Paul Lomeli <paul_lomeli@keysight.com>
Sent: Friday, December 20, 2024 5:38 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments,, 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:

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

I am a Sonoma County resident, and I strongly oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project. The Final Environmental Impact Statement (FEIS) released on November 22, 2024, much like the earlier draft environmental impact statement (DEIS), contains overly complex and technical information, but nonetheless continues to fail to adequately address the significant and far-reaching impacts this project will have on the surrounding community and Sonoma County as a whole.

While I support local indigenous tribes, this project is not suitable for Sonoma County and does nothing to restore lands to the Koi Nation, whose ancestral homeland lies more than 50 miles away in Lake County. The only way to prevent the severe environmental, social, and cultural harm this project poses is for the BIA to approve the environmentally preferred "no project" alternative in the FEIS.

I was at home the night of the Tubbs fire in 2017 and I was a volunteer with the American Red Cross at that time. That wildfire was a weather driven event that took a strange and devastating turn that night. That evening I received a call from the Red Cross to report to the office to volunteer to set up an evacuation shelter in Calistoga. After an hour of volunteering I received an emergency notification from the county that my residence address was to be evacuated. I went home and helped my wife evacuate our house with our pets in her vehicle. I will never forget the bright orange sky with the fire heading west over the hill just southeast of Shiloh park. There was a continuous barrage of propane tank explosions in the background and it was clear the fire was heading our direction. She headed south to her brother's house across town and I told her to call me when she arrived. I went back to the Red Cross and was reassigned to assist with the evacuation shelter at the Finley Center in Santa Rosa. My wife took several hours to head across town to arrive at her brother's house for a trip that normally takes 15 minutes due to traffic on the road with everyone heading away from the fire. It took an hour+ for me to get to the evacuation shelter at the Finley Center that night when normally that would also only take 15 minutes. I was assigned traffic duty on the road outside the Finley Center to instruct people where to go depending on if they were going to enter the shelter or continue heading west or south and find somewhere else to go. Traffic on the two lane road was essentially a parking lot moving at 10 mph maximum due the large number of cars trying to escape the fire. Mind you this was after midnight on a Sunday and the traffic jam lasted until the hour just before dawn. That night and the days that followed I heard numerous reports from my

neighbors in the Shiloh, Larkfield, Wikiup area stating they drove through the flames to evacuate the fire and in some cases were stuck in slow traffic while doing so.

Imagine my surprise to learn that there is interest in adding a resort and casino potentially increasing the number of people/vehicles in the same area where it was already difficult and slow to evacuate a wildfire due to limited evacuation routes. Based on my experience that night and other wildfire evacuations since 2017 I believe it is a dangerous to propose moving forward with the project as the area does not support speedy evacuations due to an emergency.

I read the FEIS and was paid careful attention to the mitigation plan for wildfire evacuation. I was extremely disappointed to learn there was no mitigation to plan for additional vehicles on the road during an evacuation. I was hoping to read some civil engineering type studies about taking A hours for x number of vehicles to evacuate a given neighborhood and that the casino/resort would add an estimate of y number of vehicles and it would that an additional B hours to evacuate the (x + y) vehicles. I would also like to see a plan that would estimate at C hours where someone's life was at risk because they were stuck during the evacuation. I did not see such detailed analysis.

Based on the current FEIS, my experience, and no details on would adding this much population to the area put human life at risk in the event of a wildfire disaster I cannot support the plan for the Koi Nation Shiloh Resort and Casino and I urge you to do the same.

Best regards,

Paul Lomeli (he/him/his)
Integration Engineer
Precision Mesoscale Technology Center | Technology Order Fulfillment

Keysight Technologies, Inc.
1400 Fountaingrove Parkway | MS 4LSB
Santa Rosa, CA 95403-1783

707 577-5514 T | 707 577-3833 F
www.keysight.com

From: evan.schiff <evan.schiff@gmail.com>
Sent: Friday, December 20, 2024 6:52 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi reservation

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am so upset that there is a complete disregard to the local citizens. I understand why we want to help tribes.

However this is not the way to right a wrong.
This town does not want this. Nobody does.

We won't be able to safely evacuate our town if there is a fire. I will hold the parties responsible for that

Also, by the way, there is a very weak connection of the tribe to this specific land. To pretend it does is insulting.

Please do the right thing and uphold the law. Everyone at the local, county, and state level are against this for a variety of reasons

This going thru is an injustice. Infact the Graton tribe, who I trust, are against this

Evan Schiff

Sent from my Galaxy

From: Beth Wolk <blwolk@gmail.com>
Sent: Friday, December 20, 2024 8:12 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Proposed Casino, Shiloh Road, Windsor, CA

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

I am writing this email to express my opposition to the Koi Nation building a casino on Shiloh Road in Windsor, CA. I am a retired school administrator and a twelve year resident of Windsor. I am concerned about this project for many reasons, the first being that it will be located in a residential neighborhood, across from a church, a mile from one elementary school as well as 1.5 miles from another school. I believe it is dangerous to have a casino that serves alcohol all hours of the day and night so close to a school. There is a distinct possibility that accidents will happen as children are crossing the street traveling to and from school. Additionally, there is a tremendous amount of traffic that is generated as children travel to and from school which will be made worse with the traffic from a casino. The building of a project as large as this one will also generate a great deal of heavy equipment and the blocking of roads making it difficult to get into the schools and dangerous during an emergency or fire. I strongly urge the BIA to hear the voices of the citizens of Windsor who oppose this project and to deny the project.

Sincerely,

Beth Wolk

Retired School Administrator

Thanks,

Beth

Beth Wolk
415-717-9734

From: altkleber <altkleber@gmail.com>
Sent: Friday, December 20, 2024 9:19 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Proposed Koi Nation Casino in Windsor

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard:

As someone who has lived for over fifty years in the area in which the proposed Koi Nation casino would be built and whose home was destroyed in the Tubbs Fire of 2017, I respectfully request that the casino not be built.

Building a casino in a well known wildfire prone area is irresponsible. Even though wildfire safety has become a focus since 2017, the roads simply cannot provide a safe and timely evacuation, especially given the increase in housing in the immediate vicinity of the proposed casino. Trust me; leaving my home in the early hours of the Tubbs Fire was harrowing and chaotic.

The proposed site is directly adjacent to a housing development as well as a much used county park. The semi rural area would be destroyed by a casino: bright lights, increased carbon emissions, use of valuable water, and noise, are only a few examples of the environmental damage. Building a casino in the proposed location simply does not demonstrate good stewardship of the land.

The Koi Nation presents itself as being community oriented yet they want to build on land that is not near their " home." Furthermore, the Koi Nation does not collaborate with other tribes in the area.

Again, please do not support the proposed Koi Nation Casino in Windsor.

Thank you

A. LuraTibbits-Kleber

Sent via the Samsung Galaxy S22 5G, an AT&T 5G smartphone

From: Jody Tuck <jtuck4@comcast.net>
Sent: Saturday, December 21, 2024 7:26 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Windsor Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

I am writing you to express my extreme opposition to the Koi Nation proposed casino in Windsor.

Please DO Not allow this to happen. A casino in that location would destroy that beautiful area. The traffic alone would create a huge mess. Have you ever travelled that area on the freeway during commute hours? It is terrible now, if you add casino traffic it would increase the mess.

I grew up on East Shiloh road. It was a beautiful place to raise children. Now with the subdivision there, families are doing just that. A casino in that area would be ludicrous.

Please, let's do all we can to stop this from happening.

Jody Tuck

From: mike.cote@sbcglobal.net <mike.cote@sbcglobal.net>
Sent: Saturday, December 21, 2024 8:20 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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December 20, 2024

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

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

Dear Regional Director Dutschke:

I am responding to the Final Environmental Impact Statement that was prepared by the Bureau of Indian Affairs for the Koi Nation Shiloh Resort Casino Project released on November 22, 2024. I am a resident of Windsor California.

The transportation and circulation matters addressed by the FEIS are serious concerns. First, because the report underestimates the effect a resort casino will have on the neighboring community, and second, because the mitigation measures outlined are both unlikely to occur and not are supported by County of Sonoma or the Town of Windsor.

The FEIS describes the Level of Service (LOS) metric as a “**qualitative** measure reflecting the traffic operation of the intersection”. If using qualitative, subjective measures is acceptable, then here are mine. With over 60 years of observation, it is beyond doubt that the resort casino interests and the local transportation jurisdictions will provide a suitable solution to the traffic and circulation issues in the foreseeable future, let alone before the first resort casino customer drives in.

After reading the Draft EIS comments and corresponding responses, it is clear that the two sides are far from any agreement. Since the mitigation efforts outlined by the resort casino interests are not aligned with the general plans of the county and cities, approval of the project should not proceed. Furthermore, reliance on unenforceable mitigation will become a burden on the community and future tax payers. Considering that there is over 300 multi-family housing units under construction (most without parking), a planned 175-unit senior living and memory care facility, and 32,000 square feet of commercial development underway or planned, the FEIS analysis of transportation and circulation impacts is incomplete and underestimates the project's effects on local traffic conditions and pedestrian considerations. This planned growth creates a variable that cannot possibly be factored into future environmental impacts.

Wildfire evacuations have been raised as a concern. The responses to the Draft EIS argue that “no warning” evacuations (like the ones that occurred in 2017) are unlikely given recent wildfire mitigation

efforts. While *wildfire* evacuations are top of mind, “no warning” evacuations due to other types of catastrophic events are likely. So far there are no successful, reliable earthquake warnings. Even with a warning (like the 2019 wildfire evacuations), it is certain – given that road work will be underway for the next 5 to 15 years – that lives will be jeopardized.

As noted by virtually every local elected official, the location of the proposed resort casino is not appropriate and far outside the general plans for this area irrespective of the FEIS.

The only option I can support is Option D, no resort casino.

Sincerely,

Michael Coté

5828 Mathilde Drive, Windsor, CA 95492

mike.cote@sbcglobal.net

From: Audrey Leyhe <aleyhe@sonic.net>
Sent: Saturday, December 21, 2024 9:15 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Shiloh casino resort

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Chad

I would like to convey my opposition to the proposed Shiloh Resort and Casino Project. I feel that it would degrade the neighborhood with excess traffic in where roads are already under strain. Noise and the availability of alcohol would farther negatively affect the now semi-rural atmosphere of the area.

Sincerely
Audrey Leyhe
5545 Corbett Circle
Santa Rosa, CA 95403

From: Darlys Perry <darlysperry@gmail.com>
Sent: Saturday, December 21, 2024 9:34 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Fwd: Casino project

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----- Original Message -----

Subject: Casino project
From: Darlys Perry <darlysperry@gmail.com>
Sent: Saturday, December 21, 2024, 9:30 AM
To: chadbroussard@bia.gov
CC:

To the Bureau of Indian affairs.

Please don't allow the proposed casino the Koi nation wants to build near Windsor. There is already enough casino opportunity. The Koi nation should work together with other established casinos and not cause so much environmental harm, traffic, etc.

Thanks for your attention.

Darlys Perry
Santa Rosa

From: Jack Long <jack.long1202@gmail.com>
Sent: Saturday, December 21, 2024 9:55 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] No new casino in Windsor

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am opposed to the idea of another casino in this county. The immense scale of the proposal is outrageous for our area. Please reject this proposal.

Sincerely,

Jack Long VMD, 40 year county resident

From: John Maier <johnwmaier@aol.com>
Sent: Saturday, December 21, 2024 11:03 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi nation casino on Shiloh Rd in Windsor - I am opposed

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am opposed to this casino being built in its proposed location. The location is next to Shiloh regional park where I go to hike for peace and quiet. The project will create excessive automobile and bus traffic and will be bad for the environment. They should locate their casino in an area that already has infrastructure to handle the traffic and congestion that will result.

John Maier
2588 Athena Ct
Santa Rosa CA 95401

From: mstrider67@gmail.com <mstrider67@gmail.com>
Sent: Saturday, December 21, 2024 11:54 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Casino near Windsor, CA

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

This note is to let you know that I am against the development of a new Indian Casino that is proposed for the Windsor area off the Old Redwood Highway south of town. There are already two Indian Casinos in the area and a third one is not warranted. This will cause increased traffic, unwanted individuals and crime, and all the environmental issues with the increased traffic and development. This will have a negative affect on the adjacent neighborhood which is primarily residential and agreicultural.

Thank you for the chance to express my opinion on this matter,

Michael R. Strider
2410 Hidden Valley Drive
Santa Rosa, CA 95404
707-318-2633
mstrider67@gmail.com

From: Elizabeth Acosta <acostalcs@gmail.com>
Sent: Saturday, December 21, 2024 1:08 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Please confirm receipt of this email (and attachments) was timely and during the public comment period. Thank you.

Sent via email to chad.broussard@bia.gov

December 21, 2024

RE: FEIS Comments, Shiloh Resort and Casino Project

We are Sonoma County residents and we join California Governor Newsom, U.S. Representatives Thompson and Huffman, Senator Padilla, State Senate President Pro Tem Mike McGuire, Sonoma County Board of Supervisors, all Sonoma County indigenous tribes, the Town of Windsor, the citizens of Windsor, and especially the neighbors who reside adjacent to the proposed project site to strongly oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project. The environmental impact statement (FEIS) does not adequately address nor mitigate the significant impacts this project will have on Sonoma County if it is approved.

We and many others have already commented on the numerous erroneous and potentially damaging conclusions based on outdated or faulty data and information which formed the basis for the FEIS that essentially claims "no significant impacts." A decision to grant a fee-to-trust transfer of land to the Koi Nation to execute their Shiloh gaming project boils down to the Bureau of Indian Affairs' (BIA) willingness to:

- 1) set dangerous precedent to allow non-native tribes to encroach on homelands of other tribes;
- 2) permit "reservation shopping;"
- 3) set irresponsible precedent to permit gaming within residential neighborhoods and other non-commercially zoned areas;
- 4) ignore the serious concerns and reasoning of local indigenous tribes, the surrounding community, and all local, state, and federal officials who oppose the proposed project.

Transferring land from a Sonoma County tribe to another non-native, Lake County tribe to facilitate approval of the Shiloh gaming project undermines not only respect for the bureau's decision-making, but also necessary support for efforts by legitimately local, indigenous tribes. This project is not right for Sonoma County. The BIA should NOT be taking land into trust for the Koi Nation's gaming project outside of its Lake County homeland. BIA must respect the sovereignty and ancestral territory of Sonoma County tribes. BIA should also respect the concerns of Sonoma County residents. This project will have significant environmental impacts and the only way to avoid them is for the BIA to approve the environmentally preferred "no project" alternative.

Why must this be a win-lose outcome? Why can't a less-intrusive location be considered? Why must one community be upended to create another? We have raised numerous concerns related to water supply, wastewater, traffic, wildfire risk and evacuation routes, law enforcement and public safety, and housing and other economic impacts. The five federally recognized Sonoma County tribes have also highlighted the impacts on them and their cultural resources. Many of the mitigation measures that have been proposed are labeled "best practice," but there is no guarantee that they will occur and there will be no legal authority over the Koi Nation to enforce mitigation promises once land is taken into trust.

We are very concerned that the BIA, in rushing this process, has not adequately considered the local environmental impacts, and cannot guarantee or enforce the mitigation that is proposed. Once again, we urge the BIA to consider these facts:

- The restored lands exception being employed by proponents of this project applies only where a casino "would not be detrimental to the surrounding community" and only where the state's governor concurs in that determination. The California governor has made clear he does not concur.
- The Koi Nation does not meet eligibility to consider a fee-to-trust transfer. Detailed anthropological, archeological, and linguistic research, as well as our family oral histories, clearly establish the fact that Koi Nation with its historic territory in eastern Lake County has no claim in any manner to Sonoma County. Koi Nation falsely claims that Sonoma County is part of their aboriginal territory even while citing Anderson Marsh in Lake County, describing to people how the Lake County region is their aboriginal home. Their aboriginal lands, on which their rancheria was established, are 59 miles from the site they claim in Windsor and their historic territory. See "*PD Koi Lawsuit*" *Attachment*.
- For generations, the Koi were situated on the shores of Clear Lake, 59 miles from the proposed site. The tribe has no ties to this community. All local elected and tribal leaders oppose this distorted interpretation of the law to "poach" land from other native peoples. No tribe has previously been allowed to take "land into trust," necessary for any gaming license, for a casino located more than 15.5 miles from their reservation or rancheria.
- There is no oversight authority to enforce any proposed mitigation measures. The environmental damage to the area would be irreversible should unfettered construction with no obligation to promised mitigation be allowed.
- On its face, it is absurd to conclude the development will have no impact on the environment or surrounding community where no development currently exists.
- This development flagrantly neglects CA law and the will of the people to permit gaming only without significant impact to surrounding communities.
- Any potential benefit is short term. The local, county, and state has weighed in and rejects this project and does not see any temporary employment as mitigating the significant long-term impacts this project will have. The sole beneficiary is the tribe, with possible short-term benefit to traveling out-of-town construction crews, which have hijacked public comment meetings with an well-organized effort to appear to demonstrate local support; they do NOT reflect the will and wishes of the local community. The local and county community that surrounds this project site is wholly opposed and will not see a net benefit.
- Traffic will be significant. And during wildfire events like we recently endured in the 2017, 2019, and 2020 wildfires, this would cost lives! The economic and destabilizing impact the fires had on the community cannot be underestimated nor mitigated.
- You must consider the dangerous precedent this sets by allowing this type of project adjacent to a mobile home park, single family home neighborhood, and large multi-family housing complexes. It is critical that any analysis use CURRENT maps of the entire,

populated surrounding area, not simply maps showing the project site and adjacent open space to the east.

(We argue many of our comments re: prior versions of the EIS remain valid and are included in this email as a separate attachment and submitted for your reconsideration)

We also call on the Department to ensure all decision-makers in this process who have any authority or influence on the Department's decision remain neutral. As we previously noted, Bryan Newland, Asst. Secretary is a former lawyer for the Koi Nation. We urge the BIA and the Secretary to remove Mr. Newland and others who have any appearance of a conflict from influencing decision-making and dispositions regarding this project.

Of the possible project alternatives under consideration, we argue that to-date testimony and comments expressing concern on the Koi project because of the actual, potential, and cumulative environmental impacts to water resources, land use, air quality, native populations' sovereignty, traffic, crime, animal species and habitat, and human quality of life remain valid and must be seriously considered. The FEIS should thoroughly, accurately, and realistically assess all the impacts raised by this and our prior letters, current residents, and local and tribal government officials. We argue that if the FEIS adheres to NEPA's mission and intent, the only viable options that "protect, restore, and enhance the environment" and "avoid or minimize adverse impacts or enhance the quality of the human environment" the proper decision is the "no-action" alternative.


For the many reasons cited above and in our previous letters (*See Attachments "letter 3.2024" and "letter 8.2024"*), we join California Governor Newsom, U.S. Representatives Thompson and Huffman, Senator Padilla, State Senate President Pro Tem Mike McGuire, Sonoma County Board of Supervisors, all Sonoma County indigenous tribes, the Town of Windsor, the citizens of Windsor, and especially the neighbors who reside in the affected area to urge the Bureau and Secretary of the Interior to reject a fee-to-land trust acquisition and the proposed Koi Nation's Shiloh Project as it does not "protect, preserve or enhance the environment" of the proposed site, encroaches on the sovereignty of Sonoma County tribes, and has no support from local, state, and federal stakeholders.

Regards,

Stephen Rios and Elizabeth Acosta
Windsor Residents (Sonoma County)
acostalcs@gmail.com

ATTACHMENTS (3)

State attorney general files legal brief supporting Koi Nation in suit against Clearlake

Department of Justice says city officials violated environmental laws through alleged failure to satisfy tribal consultation requirements to ensure preservation of cultural sites. | 



California Attorney General Rob Bonta, shown in July, announced an investigation Wednesday, Oct. 12, 2022, into Los Angeles' 2021 redistricting process. (Genaro Molina/Los Angeles Times/TNS)

MARY CALLAHAN

THE PRESS DEMOCRAT

October 20, 2023, 5:22PM | Updated 16 hours ago

The California Attorney General's Office has weighed in on the side of the Koi Nation of Northern California in a lawsuit against the city of Clearlake, saying officials failed to adequately consult with the tribe to ensure preservation of ancestral cultural sites during development of a new four-story hotel.

The project in the south part of the Lake County town is to include a 0.2-mile extension of

18th Avenue west of Highway 53 to serve the hotel and an accompanying one-story meeting hall, along with utilities, sidewalks and 109 parking spaces on land the tribe says contains cultural sites.

The city council approved a declaration last year stating that anticipated environmental impacts were not substantial enough to require full environmental analysis.

It states, in part, that review of historical records and archaeological surveys on the vacant, city-owned land — some of it already extensively disturbed by heavy equipment and other activity — did not turn up protected cultural sites.

In acknowledging “the remote possibility” for artifacts, including human remains, to surface during construction, it said developers could stop activity within 100 feet, further investigate, consult appropriate agencies and determine what mitigation measures are needed.

MNDAirportHotel.pdf

But the Koi Nation says that’s not enough, given amended provisions of the California Environmental Quality Act under Assembly Bill 52 in 2014 that require “meaningful consultation” with tribes to ascertain what cultural resources might be at risk.

Attorney General Rob Bonta agreed.

In an 18-page amicus brief filed Tuesday in Lake County Superior Court, the state argues the city’s inattention to tribal concerns and guidance violates the California Environmental Quality Act, failing to satisfy the requirement to analyze tribal cultural resources “as a distinct, separate category ... subject to the same rigors and burdens of proof as analyses of other resource categories.”

AG Amicus Order - combined.pdf

The intent of the change, the brief says, was to factor in “the spiritual, cultural, and intrinsic value of tribal cultural resources to the tribes who maintain connections with those resources” — values that “are not captured through western archaeological and historical surveys,” and thus require consultation.

State code defines tribal cultural resources as sites, features, places, cultural landscapes,

sacred places and objects.

The city did hold an initial March 2022 meeting at which Koi leaders offered evidence of important sites at risk of disturbance, as well as confidential maps of cultural resources and proposed mitigation measures, according to legal documents. (Tribes generally keep information about important ancestral sites confidential to avoid vandalism and theft.)

But then, communications stopped, and the tribe never heard back, despite repeated efforts to contact the city and continue discussions, the brief states.

"The record reflects that the City did only cursory consultation, did not meaningfully consider the Tribe's input, and did not invest 'reasonable effort' to seek mutual resolution," the state's brief says.

"The Clearlake area is home to Native American tribes who have lived there since time immemorial," Bonta said in a news release Friday. "The preservation of tribal cultural resources is of great importance."

"We stand with the Koi Nation in seeking justice and accountability. The California Legislature passed AB 52 to ensure that government agencies' consultation with tribes regarding their tribal cultural resources would be meaningful — that simply didn't happen here."

Clearlake City Hall is closed on Fridays, and city officials could not be reached for comment.

Koi Nation Vice Chairman Dino Beltran said in the news release the tribe is "grateful for the action and leadership of Attorney General Rob Bonta and his hardworking team."

"We hope this will be helpful for all California Native American Tribes in their protection of Tribal Cultural Resources moving forward," he continued. "It is important to recognize traditional cultural knowledge as evidence."

The tribe's March 2023 suit over what's called the Airport Hotel and 18th Avenue Extension Project is similar to [one filed by the Koi Nation](#) in July over proposed development of a 26-acre recreational and public works complex the city said is much needed for its citizens.

Rep. Mike Thompson, D-St. Helena, last year secured \$2 million for the Burns Valley project.

The Koi Nation is a federally recognized tribe of the Southeastern Pomo people that claims

historic roots around Sonoma and Lake counties going back 17,000 years.

It is currently involved in a dispute with public officials and residents over its proposed development of a large casino and resort project on more than 68 acres on Shiloh Road in unincorporated Windsor.

You can reach Staff Writer Mary Callahan (she/her) at 707-521-5249 or mary.callahan@pressdemocrat.com. On Twitter @MaryCallahanB.

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By City Ventures

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[Send a letter to the editor](#)

Sent via email to chad.broussard@bia.gov

March 29, 2024

Mr. Broussard,

Thank you for the opportunity to comment on the potential issues, concerns, and alternatives to be considered in the EIS re: the Koi Nation of Northern California Shiloh Resort and Casino Project. As stated in our previous comments, we join the Town of Windsor, County of Sonoma, all five federally recognized Sonoma County tribes, U.S. Representatives Huffman and Thompson, and residents of Windsor to urge rejection of this Project given the **unmitigable and irreversible impacts of the Shiloh resort/casino project put forth by the Koi Nation.**

Our understanding of the purpose of NEPA is to “make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment” and that the EIS “shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.” **We are confident that your analysis will find that environmental impacts of the proposed Koi project will *negatively and irreversibly impact the environment and will worsen the quality of the human environment.*** At the risk of repeating ourselves, we have attached our comments submitted November, 2023 primarily to ensure the information and evidence we cite are considered in your EIS. In addition, we are submitting the following current, pertinent information.

[Map Nov 2023](#)



In our November, 2023 comments on the EA, we expressed concern that a map submitted in the EA (to the BIA) misrepresented the environmental impacts in that it provided an incomplete picture of the

surrounding community; aerial views were cropped to exclude viewing the presence of surrounding residential neighborhoods. Noted in the map above, the project site is surrounded by a high-density apartment building now under construction (“A”), a church (“B”), a mobile home park (“C”), and residential neighborhoods (“D”). This broader view shows the project site is immediately surrounded by neighborhoods that will be negatively impacted by a large scale project such as this.

The EIS analysis must consider the context and timing of the proposed casino. Since providing the map above in our November, 2023 comments on the EA, the Town of Windsor has approved several projects, others are now under construction and/or nearly move-in ready. The map below shows the location of the new/approved residential projects which were not indicated in the November, 2023 map (above). The new residential projects, highlighted in blue, are listed in Windsor’s Major Project List. See attached “Town of Windsor Major Project List Updated January 2024” publication (See also: <https://www.townofwindsor.com/1450/Major-Development-Construction-Project-L>). We have marked the relevant pages with a red “star” but hope you will also glean the number of planned development projects already underway in the Town of Windsor, some due to State housing mandates; the Koi project will have a dramatic cumulative impact on environmental conditions due to its size and scope (e.g., traffic, water runoff and flooding, loss of wildlife habitat, vehicle emissions, emergency operations and evacuations). Please visit the actual site and look at the significant amount of development that includes high density affordable housing and senior living facilities which will attract low-income seniors and families, and BIPOC citizens. A major 24/7 resort and gaming project will have disproportionate impact on these socioeconomically vulnerable populations.

Map Jan 2024



Together, these additional housing projects alone will add over 500 residential units (primarily low income, high density) which will easily add 1-2,000 more people to the vicinity. Not shown on the map are additional commercial projects approved or currently under review which will bring added commercial traffic to nearby major intersections especially Hwy 101 @ Shiloh Rd (See: “Town of

Windsor Major Project List Updated January 2024”). Of note, the prospect of adding a development the size and scope of the Koi project has further alarmed nearby residents who dread a repeat of recent wildfire events. The cumulative environmental impacts of the Koi project on existing planned, residential development in the vicinity will be exacerbated. The proximity of the Koi project site to recent wildfires (to the east, Shiloh Park) can be seen below.

[Map w/Shiloh Park](#)



NEPA requires that, if a project would have significant adverse effects on the environment, mitigation for those impacts must be identified. Identification is no guarantee of implementation. Who will ensure enforcement of mitigations? Once lands are taken into trust, local, state, and federal agencies will lose regulatory oversight of the land use and any ability to enforce compliance with mitigations offered or required. Further, there is no guarantee the development would cease with the proposed project. There may be no recourse to inhibit future development or expansion of the project site, which would be after any NEPA-required environmental assessment. Local governments, regulatory agencies, and residents will lose any right to influence policy that protects the environment and its natural resources where they reside. Homeowners and others who reside adjacent to the project site may have no other way to mitigate impacts but to move. That, by definition, is an adverse impact.

Finally, we are in agreement and strongly urge you to thoroughly evaluate the items needing analysis suggested by the Town of Windsor in its draft letter dated April 4, 2024. Specifically:

“The conclusions in the EA regarding less-than-significant impacts in many of these areas were inaccurate or not adequately supported by evidence. The Town expects the EIS analysis to use up-to-date data, local policies/plans, reasonable assumptions, and technical best practices.” (emphasis added)

“The Town is also in agreement with the issues and concerns raised in the EA comment letter submitted by the Sonoma County Counsel on behalf of the County of Sonoma, dated November 13, 2023. **The Town strongly recommends that the issues and concerns outlined in the Sonoma County Counsel’s letter be considered and analyzed in the EIS.**” (emphasis added)

“One of the major concerns with the currently proposed location is its proximity to existing low-intensity residential neighborhoods in Windsor. The proposed casino resort

of this size and operational capacity would be incompatible with, and detrimental to, the quiet residential character of the surrounding neighborhoods at the current site.”

“With the information and analysis currently available, the Town finds that only the no project alternative guarantees that no significant adverse impacts will occur. Beyond the proposed project and alternative location, the EIS must include the no project alternative in its analysis. Additionally, the Town recommends the EIS evaluate any other potentially feasible alternatives that could reduce the intensity and scale of the project to minimize environmental impacts and impacts to community character.”

Of the possible alternatives under consideration, we argue that to-date testimony and comments expressing concern on the Koi project because of the actual, potential, and cumulative environmental impacts to water resources, land use, air quality, native populations’ sovereignty, traffic, crime, animal species and habitat, and human quality of life remain valid and must be seriously considered in the EIS. The EIS must thoroughly, accurately, and realistically assess all the impacts raised by this and our prior letter, current residents, and local and tribal government officials. We argue that **if the EIS adheres to NEPA’s mission and intent, the only viable options that “protect, restore, and enhance the environment” and “avoid or minimize adverse impacts or enhance the quality of the human environment” are (1) an alternate-use, reduced intensity (non-gaming) alternative, or (2) a no-action alternative.**

Thank you for the opportunity to comment.

Regards,

Stephen Rios and Elizabeth Acosta
Windsor Residents (Sonoma County)
acostalcsw@gmail.com

Sent via email to chad.broussard@bia.gov

August 22, 2024

RE: DEIS Comments, Shiloh Resort and Casino Project

Mr. Broussard,

We were initially heartened to read that—unlike the original EA—there is at least some acknowledgement in the DEIS that there are significant and potentially significant impacts to the surrounding environment. However, we remain skeptical that the Department has full understanding and facts due to a flawed and inadequate DEIS that fully reflects the very significant and devastating impact this project would have on the local community. **There is a reason ALL of our local, county, state, and federal representatives have joined local indigenous tribes to oppose this project.** It sets a dangerous precedent by not only dismissing the environmental impacts but also by ignoring the will of California voters, California law, and potentially extrapolating unprecedented legal applications of federal laws.

We agree and want to reiterate current and prior comments submitted by the Town of Windsor, the Sonoma County Board of Supervisors, Senator Mike McGuire, Representatives Mike Thompson and Jared Huffman, U.S. Senator Alex Padilla, Governor Gavin Newsom, and all five federally-recognized indigenous Sonoma County tribes who remain unified in their opposition to this project.

The DEIS presents significant shortcomings in addressing the potential impacts of the Project on water resources, including groundwater, surface water, and floodplain management. We concur with all numerous points the Town of Windsor identified citing critical deficiencies that, if left unaddressed, could lead to severe and unmitigated adverse impacts on the region's water resources, with potentially long-lasting consequences including: failure to fully analyze the impacts of groundwater extraction and unsustainable mitigation to compensate neighbors; inadequate monitoring plan; no plan for ensuring long term sustainability of water resources; an illegal plan for use of recycled water; use of outdated maps for flood planning; inadequate wastewater storage plans and overall problematic wastewater management proposals; inadequate plans to preserve and protect wetlands and riparian areas; inadequate plans to protect native threatened species; failure to consult with local tribes; failure to thoroughly identify all tribal cultural resources on the project site; failure to adequately address affordable housing impacts for local workers; failure to adequately address impacts on public services while relying on unenforceable and vague “agreements;” significantly flawed traffic studies; seriously insufficient emergency management analysis of evacuation times, potential bottlenecks, and mitigation measures which directly impact the safety of both residents and visitors in the event of a wildfire (this is not hypothetical - we lived through this three times since 2017!); fails to adequately address the impacts of converting agricultural land to a commercial gaming facility, which is inconsistent with the County's Land Intensive Agriculture designation; the cumulative effects analysis in the DEIS is insufficient and does not fully account for the combined impacts of the project on

water and other natural resources, traffic, housing, and public services alongside other planned developments in the region.

In addition:

- The restored lands exception being employed by proponents of this project applies only where a casino “would not be detrimental to the surrounding community” and only where the state’s governor concurs in that determination. The California governor has made clear he does not concur.
- For generations, the Koi were situated on the shores of Clear Lake, a 55-mile drive from the proposed site. No tribe has previously been allowed to take “land into trust,” necessary for any gaming license, for a casino located more than 15.5 miles from their reservation or rancheria.
- There is no oversight authority to enforce any mitigation measures listed.
- On its face, it is absurd to conclude the development will have no impact on the environment or surrounding community where no development currently exists.
- The tribe has no ties to this community. All local elected and tribal leaders oppose this distorted interpretation of the law to “poach” land from other native peoples.
- This development flagrantly neglects CA law and the will of the people to permit gaming but without significant impact to surrounding communities.
- Any potential benefit is short term. The local, county, and state has weighed in and rejects this project and does not see any temporary employment as mitigating the significant long-term impacts this project will have. The sole beneficiary is the tribe, with possible short-term benefit to traveling out-of-town construction crews. The local and county community that surrounds this project site is wholly opposed and will not see a net benefit.
- Traffic will be significant. And during events like we recently endured in the 2017, 2019, and 2020 wildfires, this would cost lives! The economic and destabilizing impact the fires had on the community can not be underestimated nor mitigated.
- The report states there will be at least potential significant impact to noise, land use, public services. You must consider the dangerous precedent this project sets by allowing this type of project adjacent to a mobile home park, single family home neighborhood, and large multi-family housing complexes. It is critical that any analysis use maps of the entire, populated surrounding area, not simply maps showing the project site and adjacent open space to the east.
- We argue many of our comments re: the EIS in March, 2024 remain valid for the DEIS and are included in this email as a separate attachment and submitted for your reconsideration.

We also call on the Department to ensure all decision-makers in this process who have any authority or influence on the Department’s decision remain neutral. It has come to our attention that Bryan Newland, Asst. Secretary is a former lawyer for the Koi Nation. **We urge Secretary Haaland to remove Mr. Newland and others who have any appearance of a conflict from influencing decision-making and dispositions regarding this project.**

Of the possible project alternatives under consideration, we argue that to-date testimony and comments expressing concern on the Koi project because of the actual, potential, and cumulative environmental impacts to water resources, land use, air quality, native

populations' sovereignty, traffic, crime, animal species and habitat, and human quality of life remain valid and must be seriously considered in the DEIS. The DEIS must thoroughly, accurately, and realistically assess all the impacts raised by this and our prior letter, current residents, and local and tribal government officials. We argue that **if the DEIS adheres to NEPA's mission and intent, the only viable options that "protect, restore, and enhance the environment" and "avoid or minimize adverse impacts or enhance the quality of the human environment" are (1) an alternate-use, reduced intensity, non-gaming alternative, or (2) a no-action alternative.**

Thank you for the opportunity to comment.

Regards,

Stephen Rios and Elizabeth Acosta
Windsor Residents (Sonoma County)
acostalcs@gmail.com

ATTACHMENT

From: Joe Finigan (Omni Alien) <omni707@gmail.com>
Sent: Saturday, December 21, 2024 1:20 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Proposed Koi Nation Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard, I write this letter to you because of my concern over the proposed Koi Nation casino project. It has come to my attention that the proposed project is still being considered after much pushback from the state and surrounding tribes. This proposal would allow the Koi tribe to build a casino on land that is not their own, setting a dangerous precedent for anyone in the future wanting to do the same. This would be a massive disregard to the local tribes, especially to those who have been denied the same request on their own land.

The local tribes and communities would also be subject to an influx in crime as well as a depreciation in their properties' value. The Lytton Rancheria was just able to establish and build their own reservation which would be negatively impacted by the effects of this proposal. As well as the community, the environmental damage that would be done to land that they have no right to disturb, would be great and irreparable. Attached is a link that further elaborates on this issue. <https://www.marinij.com/2024/11/08/north-bay-voice-proposed-casino-could-increase-community-wildfire-risk/>

I am not the only one that feels this way.

Many elected officials such as Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, State Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson and U.S.

Senator Alex Padilla are also against the approval of the Koi Nation casino.

I urge you to give consideration to what has been said and to hear the voices of the local community who opposes this casino. Thank you for your time and consideration.

David Finigan
(707) 954-0232
david@finiganrealestate.com

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Sent from my iPhone

OPINION > COMMENTARY

North Bay Voice: Proposed casino could increase community's wildfire risk



A design rendering of the proposed Shiloh Resort & Casino in Sonoma County. (Koi Nation Sonoma)



By **HANK SCHREEDER**

PUBLISHED: November 8, 2024 at 2:51 PM PST

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Californians are no strangers to wildfires. Every year, emergency responders and county officials prepare by examining evacuation plans to ensure residents can swiftly reach safety during a fast-moving fire. This year, officials in Washington, D.C. are making local emergency response analysis more challenging in Sonoma County.

The U.S. Department of the Interior is poised to approve a new mega casino that threatens safe evacuation routes for thousands of residents. In their zeal to restore land to an out-of-county tribe, DOI is ignoring the well-reasoned concerns of the local governments charged with managing evacuations, the Indigenous Southern Pomo people, who have managed fire on this land for generations and their own environmental reviews that identify a clear and present danger to Sonoma County residents.

Our neighbors know that when a natural disaster occurs, every second counts. Wildfires can rapidly escalate as winds shift, turning warnings into mandatory evacuation orders. That was the case earlier this year when Sonoma County's Point Fire forced hundreds of residents to evacuate their homes to reach safety. The Point Fire was not unique. Since 2008, our region has experienced 29 major wildfires.

In many ways, though, the frequency and severity of wildfires in the area have brought the community closer. Elected leaders, developers and local communities work together to assess and plan new economic projects with an eye toward ensuring public safety – and that's why many in the community strongly oppose the proposed Shiloh Resort and Casino.

The Koi Nation's proposed casino site is situated along a major evacuation route outside Windsor in an area designated as "wildland-urban interface." Economic development in the area requires thoughtful planning to ensure that buildings and facilities will not create traffic bottlenecks and hinder access to evacuation routes. But the stakeholders most capable of raising these legitimate concerns are being shut out by federal decision-makers.

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Even the federal government's own environmental impact review of the Koi Nation's proposed casino found it would disrupt current evacuation routes. Local officials in Windsor are keenly aware of the unnecessary risks this project creates. They estimate the casino would extend the already dangerously long two-hour evacuation to an excruciating and life-threatening eight hours. The Koi Nation has not provided sufficient details on how to mitigate these threats.

[Read More](#)

00:00

02:00

These public safety concerns are paramount. However, the project's boosters have failed to reckon with the multitude of other strains the casino would impose on our already overburdened resources and infrastructure. Our groundwater and stormwater management systems cannot withstand the added demands the casino would bring. Meanwhile, local residents could see their drinking water choked off as the casino and resort draw on limited supply. Our current roads are not constructed to handle an influx of visitors every week. To date, we still have not seen sufficient information about how local law enforcement and emergency medical services personnel will cope with the increased demand.

Human lives are not the only ones at stake. Construction would endanger wildlife habitat, fragmenting wildlife populations and their ecosystems. The increased demand for cooling services during summer would place additional stress on our power grid. Additionally, the environmental review for the

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Despite these mounting concerns and the overwhelming opposition from the community, labor, our elected leaders, and the indigenous people of the area, Interior Secretary Deb Haaland and her staff at the DOI need to step in to ensure our neighborhood is safe. Because today, in Sonoma County, the Koi Nation's casino project is not a gamble we should take.

Former Santa Rosa Police Chief Hank Schreeder served in the department for 28 years.

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From: Robert Pete <rlpete@me.com>
Sent: Saturday, December 21, 2024 2:23 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Re: FEIS Comments, Shiloh Resort and Casino Project

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Sorry this came back and I don't know why.

> On Dec 18, 2024, at 1:35 PM, Robert Pete <rlpete@me.com> wrote:

>

> Sir,

> I'm writing this comment to protest Koi tribe's blatant attempt to acquire land which they have never, as a tribe, occupied either historically or currently. The Koi tribe resides primarily in Lake County, California. They previously attempted the same process in Marin County, California. Since they want a casino & resort my question is why do they not improve their existing Lake County casino rather than, in effect, stealing another tribe's property that they see as more favorable?

>

> Thank you for your time,

>

> Robert Pete

> Elder FIGR tribe Santa Rosa Sonoma County, California

> 855 Daniel Street

> Sebastopol, Ca 95472

From: theresa benson <bensonfamily003@hotmail.com>
Sent: Saturday, December 21, 2024 4:27 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS comments, Shiloh Resort & Casino Project

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Dear Mr. Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs:

It is my understanding that the KOI Indian Tribe is wanting to build a casino & resort on Shiloh Road in Windsor, California. The plan to build the Shiloh Resort & Casino is a terrible idea for the current sought after piece of land. The planned location is next to a long-time residential area where everyone has enjoyed their peaceful lifestyles. Hence, building a Casino & Resort will change the whole dynamics of this area. It will no longer feel like a safe environment for the existing community. A Casino & Resort will bring increased traffic, depreciate the property values, and the potential for theft, violence and excessive drug & alcohol use which creates a safety concern for the community. The building of a Casino & Resort will have a huge environmental impact on the entire Windsor community.

Why hasn't this Project been killed a long time ago especially, when **Federal, State and Local officials strongly oppose the building of this Casino & Resort. How is it possible for the KOI Indian Tribe to build on non-aboriginal tribal territory without consulting with local tribes who would be impacted by this project? And, it doesn't seem legal that the KOI tribe** be provided with funds from another tribe, who are located out of California, for building this Casino & Resort.

Please help to stop the KOI Indian Tribe from building on Shiloh Road in Windsor, California. This property is not their sacred land and they are not entitled to it. The Windsor community is strongly against building of a KOI Casino & Resort because of the negative impacts it will have on them, especially in the proposed location. With your help in putting an end to this project, we can continue to keep the Windsor Shiloh Road residents safe and enjoy where they live.

The Shiloh Road, Windsor area homeowners feel they haven't had the necessary time to voice their concerns and don't feel heard in this matter. It would be greatly appreciated if you could get others to agree to grant an extension on the final decision of whether or not to proceed with the build of the KOI Indian Casino & Resort. In all fairness, the Windsor community would like the opportunity and time needed to fight to stop this project from moving forward.

Thank you for your support in this matter.

Sincerely,

Theresa Benson
(Supporter of keeping the Windsor community a nice place to live)

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From: Tina Martin <tina.m.luv143@gmail.com>
Sent: Saturday, December 21, 2024 5:11 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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I'm sending this to both addresses that I have for you.

Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs,
at chad.broussard@bia.gov Subject: "FEIS Comments, Shiloh Resort and Casino Project"

Mr. Broussard,

This letter is my statement in regards to being extremely opposed to the Shiloh Resort Casino plan. The proposed plan is located literally a half block from where we live. A casino in a residential area? East Shiloh Rd has numerous homes and the Shiloh Casino plan would be located right across the street from lifelong residents. How could this be legally permitted? Are they going to force residents out of their homes? A million square ft of natural habitat would be rezoned for the likes of a Casino? Seems very wrong to me. I can see why the Koi Nation would like for this location to build a casino for their tribe. To them it would be the perfect place. But, the impact it would have to the rest of the community, residents and other native tribes is beyond unfair and damaging in so many ways. It would change the dynamics of the entire town. I'm appalled that this plan is even being considered. Out of curiosity, I looked up the definition of Shiloh. It said, Shiloh means "place of peace." Building a casino is far from peaceful. I'm a resident residing on Shiloh Rd between Old Redwood Highway and Hembree Ln. My life partner, Steve and I have been living here for going on 24 years now. The Walmart shopping center and Home Depot store were just being built on Hembree Ln at the Shiloh Rd cross street at the time. Not to mention the high airlines traffic as the airport is within five minutes of here. We have several reasons why we are against this plan. The number one reason is the excessive amount of traffic congestion. During weekdays there's literally hundreds maybe even thousands of vehicles that travel this stretch of Shiloh Rd. Half of which are huge industrial trucks and buses of all kinds. These vehicles are extremely loud and the smells are very strong (lingering for hours and the exhaust smells get inside our house just from opening the door) and the emissions are toxic. It's awful. Weekday traffic starts about 5am in the morning and doesn't stop until around 10pm. At least late nighttime's are quiet. I get maybe two hours of sleep per day and the quiet is very necessary as I have severe insomnia and can't sleep so I'm awake most of the time. And yes, I do use earplugs. During the days this doesn't help. We are senior citizens now neither of which are in good health. We spend most of our time at home. As it is, we have to walk guessing 100 ft to cross the street for our mail each day. At times that can take longer than 5 - 10 mins. due to excessive traffic. Same with trying to get out of our driveway with our vehicles just to go to the store. Since we moved here, they added street lights on both sides (at Old Redwood Highway and Hembree Lane and at the Shiloh Rd freeway entry and exits.

Several years ago they added a big apartment complex behind us. Within the last couple years, another huge apartment complex on Old Redwood Highway at Shiloh Rd. Now on the corner of Hembree and Shiloh Road another huge apartment complex that will have a few little shops in its plan that still hasn't been finished yet. All of which have created more people more vehicles much more traffic and it's already overwhelming. I've talked to several of our local neighbors and several Sonoma County residents all of which are very much against another casino being built here in Windsor let alone on Shiloh Road. From what I've learned years ago the Lytton Rancheria tribe were denied being allowed to have a casino built here. It would be completely unfair for any other tribe to be given the opportunity to do so. As it is, there is already two casinos here in Sonoma County within 15 minutes of each way of us. River Rock Casino and Graton Casino. And personally, I know that on weekends casinos are packed. Which would mean that weekends would be also filled with excessive traffic 24 hours a day. The Shiloh casino would benefit the Koi Nation tribe which in turn would take from the other tribes. And as I've learned the Koi Nation tribe is native to Lake County not Sonoma County. Casinos bring gamblers, create addictive gamblers, crime rate will go up, the natural habitat and environment will be destroyed as well as many other things. This once nice little family town will be changed forever and not for the greater good of nearby residences and/or The town of Windsor. So for myself, my life partner and my neighbors that live here on Shiloh Road and the town of Windsor community we all ask that you please do whatever you have to do to prevent the Koi Nation tribe from building the Shiloh Resort Casino. No Koi casino in Windsor now or ever. And if ever the proposal of a future casino, it should be granted to the Lytton Rancheria Band of Pomo tribe. For this is their native land. Thank you so much for your time and assistance to this matter. Enjoy your holidays. Sincerely, Tina Martin and Steve Winton

[189 Shiloh Rd, Windsor, CA 95492-9606](mailto:tina.m.luv143@gmail.com)

Today's date : 12/21/24

Contact info:

Tina Martin (707) 953-0183 tina.m.luv143@gmail.com

Steve Winton (707) 304-9963 buzsaw74@gmail.com

From: dianaborges101@att.net <dianaborges101@att.net>
Sent: Saturday, December 21, 2024 5:55 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard,

Attached is my comment letter regarding the Final Environmental Impact Statement (FEIS) for the Koi Nation Shiloh Resort and Casino Project.

Diana Borges

December 20, 2024

Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs, Pacific Region
chad.broussard@bia.gov
Sent Via Email

FEIS Comments, Shiloh Resort and Casino Project

Dear Mr. Broussard,

I am providing comments regarding the Final Environmental Impact Statement (FEIS) that was prepared for the Koi Nation Shiloh Resort and Casino Project. It is my opinion that if the proposed development is constructed not only will it have significant negative impacts to our community and environment, it could cause life-threatening situations, and cause many residents to relocate because the reasons we moved to the area will be gone.

It is also my opinion that the FEIS is still inadequate and unacceptable, with underestimated risks and proposed mitigative measures that will not address some of the risks. Although there have been some improvements since the Environmental Assessment (EA), there are still unsupported speculations and proposed mitigations that will not be effective or possibly feasible because they rely on the participation of a third party. The FEIS lists several best management practices (BMPs) under mitigative measures, however BMPs are not mitigative measures. As an example, Table ES-1 has BMPs listed as a method to mitigate the possibility of aquifer drawdown.

The arguments raised in Governor Newsom's August 16, 2024 letter and concerns from other local Tribes are not only significant but have legal references why this project should not move forward (fee-to-trust transfer). This includes whether the Koi Nation has the necessary ancestral ties to the property, the involvement of the other Tribes, and the rushed timeframe BIA has taken to complete the NEPA process. The letters submitted regarding the draft EIS by agencies such as Sonoma County, Sonoma County Public Infrastructure, and Town of Windsor, as examples, provide technical reasons why this project should not be approved. These local agency people are the ones who know firsthand if a condition would be less than significant impact, potentially significant, or significant. The FEIS does not address all the concerns submitted regarding the DEIS.

It is very disappointing that many of our public comments have apparently been deemed not "representative substantive comments" since the documents for the project have not addressed the concerns, and responsive BIA comments were not included in the FEIS. It is hard to believe the 5 written individual private citizens, organizations or private businesses comment letters that the BIA addressed in the FEIS fully represent all the representative substantive comments that were submitted in at least 292 submitted, written public letters.

How is the fact that there are no plans to upgrade the two-lane Shiloh Road/Highway 101 overpass not representative and substantive, when the FEIS estimates an additional 11,213 daily project vehicles during the week and 15,779 on Saturdays? This is in addition to the influx of other vehicles when the projects listed in FEIS Table 3.14-1, along Shiloh Road and Old Redwood Highway are complete – estimated by FEIS for these 7 developments opens are 448 living units and 29,000 square feet commercial space. During an evacuation, the influx of vehicles from the project and these developments can easily cause a life-threatening situation when a wildfire is nearby and exasperate conditions that locals endured during the Kincade Fire evacuation in 2019.

Having the final public comment period for this proposed project during the holidays, especially ending right before Christmas seems rushed and intentional to reduce public comments. I request the BIA seriously take into consideration the precedence being set for the United States, if this project is approved. That includes how close to residential areas, churches, and parks, location in historical high wildfire area with evacuation limitations, narrow, two-lane access roads, the close proximity to 2 other casinos, the impact to other Tribes, all public comments, and more. If approved, Sonoma County will have 3 casinos (project, Graton Casino, and River Rock Casino) within a 33-mile stretch, with Graton Casino and the project casino being two of the largest in California.

I have provided specific concerns and questions below regarding three topics. However, I have many other concerns, some that were submitted in my two previous letters and apparently dismissed.

Traffic

- I am still very concerned that Shiloh Road and Old Redwood Highway cannot accommodate the increase in vehicles and that proposed mitigative measures will have minimal, if any effect. These access roads are two-lane, rural-like roads, with no sidewalks (except limited north of project site at residential development and park), no street lights, and open drainage ditches in some areas. In addition, the asphalt on several stretches of Shiloh Road, and Highway 101 overpass and ramps are already damaged. See attached photos for reference.
- The proposed development will be approximately the same size as Graton Casino in Rohnert Park. I have provided photos of the main Graton Casino access road for comparison. The road into Graton Casino is a 4-lane road, with a stop light for entering the casino driveway, sidewalks and no open drainage ditches.
- As stated in a previous letter, if 10,000 cubic yards of import soil alone is required, that would be about 500 end dump trucks (20 cy per truck) going to and from the site. That number of loaded trucks travelling on Shiloh Road or Old Redwood Hwy would likely cause additional damage to the roads.
- The FEIS states “During construction, there would be a maximum of 978 daily construction trips to and from the Project Site due to commuting workers. ... Additionally, there would be vendor trips and material hauling trips, but these would not occur during the peak traffic times and would be dispersed throughout the day. The majority of construction traffic would utilize US 101 as the regional access route and

Shiloh Road or Old Redwood Highway for local access.” However, there are no evaluations or mitigations proposed for Old Redwood Highway, south of the site, including the Airport Blvd/Highway 101 offramp that will likely incur increased traffic. For an 8-hour work day, 978 daily construction trips equates to over 100 trips per hour, which is significant.

- Construction is anticipated to be 18 to 24 months and the FEIS implies because this is temporary, it is not a concern. Two years of construction is significant for those who will be negatively impacted by these activities.
- The Town of Windsor, Sonoma County, and the California Department of Transportation (Caltrans) should not be burdened with costs to mitigate any impacts caused by the project. All road improvements should be completed prior to the project opening, not in phases.
- The FEIS proposes mitigative measures and assigns financial responsibility to the Town of Windsor, which they have not agreed to. How will mitigative measures be completed without the Town of Windsor’s financial help? This applies to traffic mitigations and the proposed groundwater study.
- Even if Shiloh Road is widened, the Shiloh Road/Highway 101 overpass will remain a bottleneck, more than it already is. I contacted the California Department of Transportation who stated they have NO plans to upgrade the overpass, including widening.
- The Shiloh/Highway 101 overpass is in the FEIS’ OFF-SITE TRAFFIC MITIGATION EFFECT AREA but there are no mitigative measures for the overpass. What mitigative measures will be done to the overpass and the on/offramps to make sure the in-flux of thousands of vehicles, buses, and trucks will not exacerbate the current situations? What mitigative measures will be done to the overpass and the on/offramps to facilitate quicker evacuations?
- Events at the casino will negatively impact roadways and residents. The FEIS assumes there will be 2,380 people in attendance at events and “... it is projected that approximately 1,023 vehicle trips will be generated by the event center during the weekday and Saturday PM peak hours.” A typical scenario then will be 1,023 vehicles leaving the event center about the same time at night, after people have been drinking and “partying”. These people will be driving on two-lane roads, with no street lights, past residential developments and two mobile home parks. A line of vehicles will extend along Shiloh Road, from the project site to Highway 101 and south along Old Redwood Highway (past a senior mobile home park). This will negatively impact roadways (traffic and garbage), increase light pollution from vehicle headlights, and increase noise levels for the individuals who are living nearby trying to sleep.
- Events at the casino will also negatively impact Luther Burbank Center, located approximately 3 miles south of the site and Graton Casino, due to competition for audience and performers.

Evacuations

- The increase in casino guest and employee vehicles will create a life-threatening situation (for residents and casino guests) for a no notice evacuation and likely for a short notice evacuation.
- According to the U.S. Department of Transportation, a No-Notice Event is “A little- or no-notice incident is one that occurs unexpectedly or with minimal warning. The lack of warning and the quick response time required introduce distinct challenges for evacuating at-risk populations. No-notice incidents do not provide emergency responders sufficient time to prepare for a specific incident. This greatly affects agencies’ abilities to pre-activate emergency protocols, pre-position needed assets, and warn and direct the public. No-notice evacuations require a significantly different approach to planning than advance notice evacuations because they will be based on a set of capabilities and strategies that will likely be more limited in the time and resources available for implementation.” These statements are counter to the FEIS’ evaluations for evacuation impacts during a no notice event.
- During a no notice event, the FEIS estimates it will take 3.5 hours for the area to evacuate without the casino and an additional hour to evacuate due to casino vehicles. This is not acceptable and is life threatening when a wildfire is in the area. A no notice evacuation means evacuate immediately, not that you have 4.5 hours to be out of the potential wildfire impacted area. There are no effective mitigative measures in the FEIS for a no notice evacuation.
- Casino employees supposedly will direct traffic on the project property. However, they will not be allowed to interact with vehicles on public roadways, even if they are CERT trained and certified. The proposed measure will have no positive impact on offsite traffic (public roadways).
- The FEIS uses the Kincade Fire situation as an example for a notice event; however, parts of Sonoma County experienced a no notice evacuation during the Kincade Fire. I evacuated initially from Windsor to south Sebastopol. At about 2 am in the morning, I received an evacuation alert and right after, a Sheriff’s car drove by announcing on the loudspeaker, evacuate now (an immediate evacuation alert). Even with the additional alert systems in place, a no notice evacuation is still a reality and needs to be the level we prepare for.
- It should be noted that the Windsor Kincade Fire evacuation was not a typical evacuation notice time. For most wildfire evacuations, you are not notified 6 hours in advance of when you need to be vacated. Even with the 6-hour advance notice, Shiloh Road, Old Redwood Highway, Highway 101, and other roadways were gridlocked in 2019. Photos of Highway 101 gridlocked during the evacuation are attached. Please note the photos were taken at about 1 pm, with about 3 hours left to evacuate and the roads became more congested closer to the evacuation deadline.
- The FEIS implies that guests will make themselves familiar with evacuation routes, stay informed and connected to all available emergency alert tools, and follow directions provided by staff. Guests will be gambling, being entertained, and drinking, not focused

on being ready in case of an emergency. Out of sight, out of mind mode. How many people even look at fire escape routes in hotels?

- According to the WILDFIRE RISK ASSESSMENT AND DRAFT EIS REVIEW FOR A PROPOSED CASINO COMPLEX AT WINDSOR, CALIFORNIA, dated August 24, 2024, prepared for Graton Casino, “Looking at the A/E 2 t Ga Findings from Review of the Shiloh Resort DEIS 23 situation the core question would be how long would it take to get all of the involved people (Project and housing development) out of harm's way? And, when it comes down to it, there may not be a traffic engineering solution to the shorter time requirements typical of an emergency wildfire evacuation scenario.” This study is more in alignment with what we have experienced in Sonoma County than the conclusions in the FEIS.

Water-Supply

- The FEIS again proposes replacing nearby water-supply/irrigation wells if they become impacted by project pumping (with specified criteria). As mentioned in my letter on the Environmental Assessment, replacing impacted wells is not a mitigative measure, but a compensation plan for after the fact. An example of a mitigative measure would be to reduce onsite pumping when lowering of the aquifer is first observed.
- From the FEIS, “To register for the program, well owners will be required to complete a Well Information Questionnaire regarding the construction, use, history, and performance of their well, and to sign an Access Agreement that allows access for periodic measurement of water levels and assessment of well conditions and performance.” Many well owners do not know construction details for their wells and the data is not available because Well Completion Reports were not submitted to the State when the wells were installed. Apparently, the Koi Nation do not even have well completion details for all of their wells, but did find well logs for their onsite wells 1 and 3 since the EA. Will well owners be disqualified from the reimbursement program if they do not know their well construction details or will they have to pay for a geophysical survey to find out the information?
- If an impacted well is replaced, will the owner also be compensated for abandonment of the old well or any other requirements by Sonoma County for installation of the new well? These are costs they would not have incurred if their well still functioned.
- Per the FEIS, “As an alternative to reimbursement, the Tribe may, at its sole discretion, elect to connect the claimant to an alternative potable water source at the Tribe’s expense.” If a well owner is required to connect to a water system, will they be compensated for the monthly fees to pay for public water? Once again, these are expenses they would not have incurred if their well was not impacted by the project wells.
- Who is going to conclude a nearby well has been impacted by project pumping vs. pumping by the Town of Windsor and who is going to evaluate the well owner’s claim that their well has been impacted? This needs to be done by a third party who does not have a conflict of interest. If the Town of Windsor disagrees with their financial responsibility, will the Tribe cover the costs or does the well owner just not receive reimbursement?

- It will be difficult, if not impossible to assign percent of interference pumping to project pumping vs Town of Windsor pumping. It will be even more difficult to get both parties to agree.
- Please note this is a reimbursement program. The costs to install a new well, piping, and pump can cost thousands of dollars that the well owner may not have upfront to pay. What options does the well owner have if they cannot pay and how long will the well owner be burdened before they receive reimbursement?

I support the Koi Nation in obtaining sovereign land but it is my opinion that the project location is not appropriate for Alternatives A, B or C and that there will be significant negative impacts to the environment, other Tribes, businesses, and residents in the area. To protect the environment and preserve public safety, I strongly oppose the Koi Nation's proposed fee-to-trust transfer and urge the BIA to prepare the Record of Decision to conclude no action for this property. Thank you for considering our public comments and all potentially relevant impacts.

Diana M Borges

Diana Borges, PG
Windsor Resident

Attachments: Photos

PHOTOS

Roads Near Proposed Project
Note road damage, road width, ditches, and lack of sidewalks.



Shiloh Road Looking West Toward Highway 101 Overpass



Shiloh Road Looking East Toward Proposed Site



Shiloh Road Looking East to Old Redwood Highway Intersection

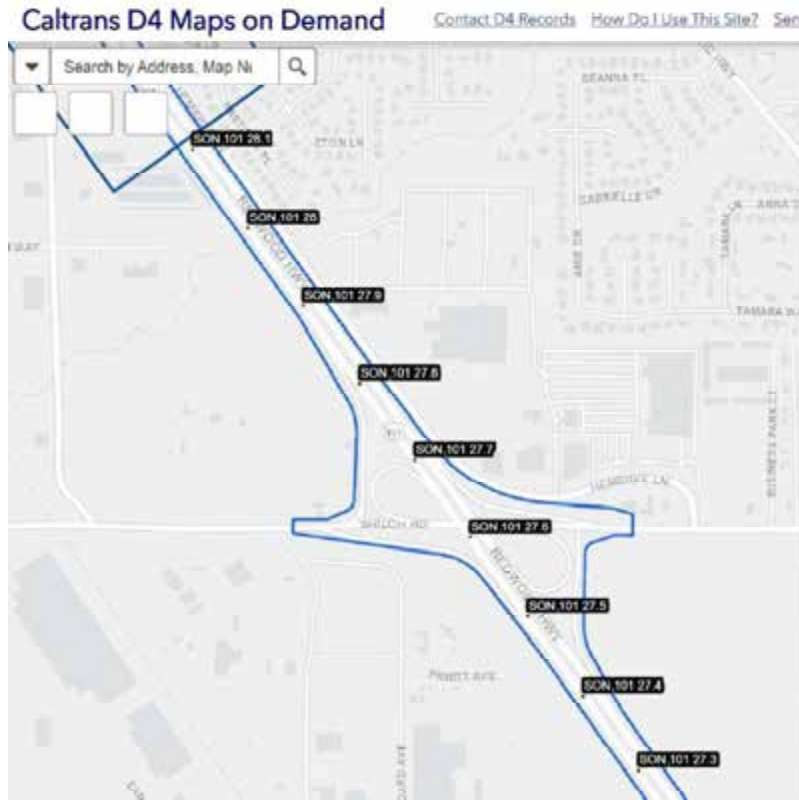


Shiloh Road Looking East, Project Site is on the Right



Old Redwood Highway Looking South, Proposed Site is on the Left

Caltrans Right-of Ways at Shiloh Road
Note existing road damage, and restrictive one-lane on and off-ramps



Map from Caltrans Website



Road Damage on Shiloh Overpass and Ramps



Highway 101 Southbound On-Ramp



Highway 101 Northbound Off-Ramp



Highway 101 Northbound Off-Ramp Flooded (Closed) in November 2024

Graton Casino for Comparison to Roads Near Project Site



Golf Course Dr Looking West. Graton Casino in Back Left.



Golf Course Drive Looking East to Highway 101

Images from Kincade Fire Evacuation in 2019



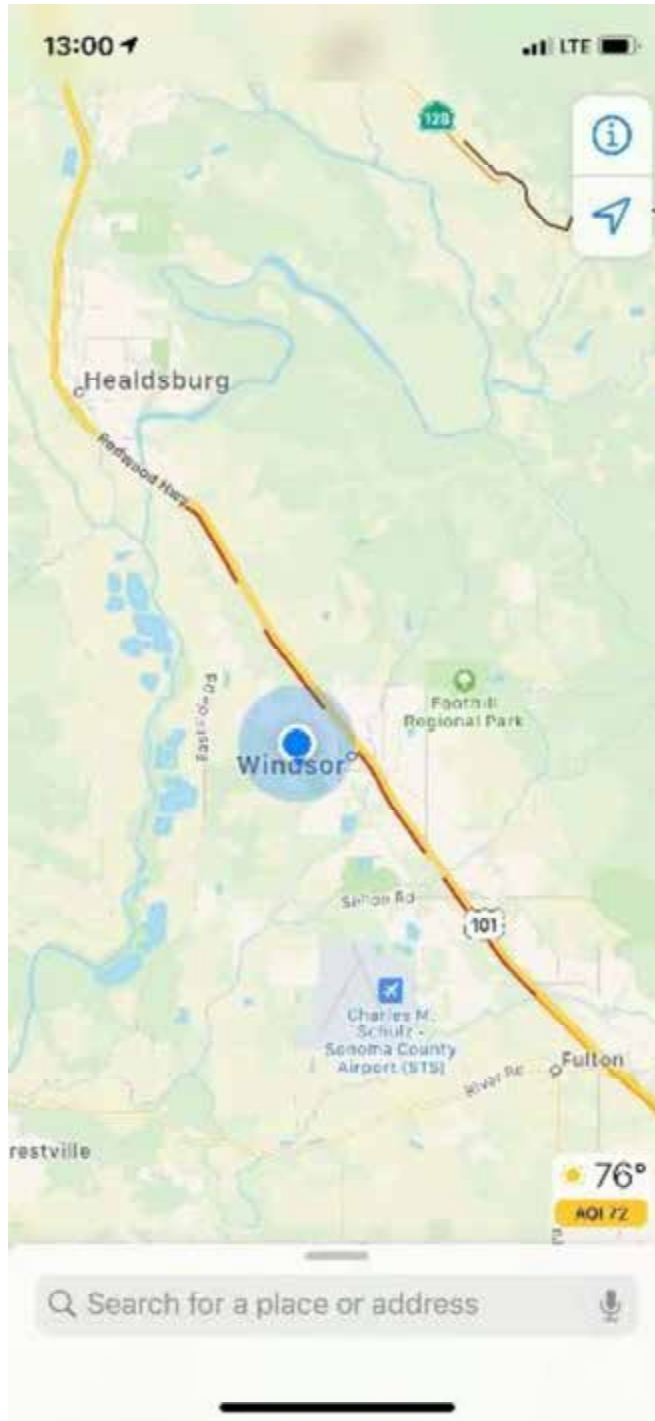
Photo Caption: Traffic backs up on Highway 101 at Shiloh Road in Windsor on Saturday as residents follow evacuation orders for the Kincade fire. (CHRISTOPHER CHUNG / The Press Democrat)

From article: **1:25 p.m.** Just before 1 p.m., traffic on southbound Highway 101, between Santa Rosa and Windsor, was at a standstill but creeping along between Healdsburg and Windsor.

Reference: <https://www.sonomanews.com/article/news/kincade-fire-mandatory-evacuations-for-healdsburg-windsor-warning-zone/?artslide=3>



Photo Caption: Windsor (California, US): Traffic is backed up heading south on a highway during mandatory evacuations due to predicted danger from the Kincade Fire.—AP. Reference: <https://www.dawn.com/news/1513377>



Map from October 26, 2019 at 1 pm shows congested areas along Highway 101. Obtained from Town of Windsor Police Department.

From: Steve Hogle <ohana@sonic.net>
Sent: Saturday, December 21, 2024 7:57 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] "FEIS Comments, Shiloh Resort and Casino Project"

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December 21, 2024

Regarding proposed casino project 222 E. Shiloh Road, Windsor CA

To ALL concerned,

This letter is to address my families concern related to the proposed development of a casino on the 68.6-acre property located at 222 E. Shiloh Road bordering Windsor and Santa Rosa California.

After evaluating the plan for this project, I must consider the impact that it will have on our surrounding community, families, traffic, and the general wellbeing of this area. At this time, the town is being developed at a rate which is challenging the surrounding environment. This project will over stress the common welfare of this neighborhood by demanding excesses in every aspect of its infrastructure which was never designed into the adjacent area or for this scope of development.

It has always been my impression that the Native American culture, the first settlers who inhabited these sacred lands were most concerned about preservation and wellbeing of all natural resources. That these lands were to be respected as sacred and to be preserved for what they would bare for generations in their natural forms. A land once developed loses its soul and the earth it is on is forever forsaken.

Please reconsider your plan for this "casino resort" project by finding a more suitable location that will not have such an extreme effect on our neighbors and our surrounding community. I urge you to look at this keeping in mind the drastic effects it will have on the land and the neighborhood.

Sincerely,

Steve Hogle Family

From: Lynn Darst <backpackers_darst@sprynet.com>
Sent: Sunday, December 22, 2024 8:26 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments - Shiloh Resort & Casino Project

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Sent from my I-Pad

Lynn R. Darst
5845 Mathilde Drive
Windsor, CA 95492
Backpackers_darst@sprynet.com

December 22, 2024

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

Dear Ms. Dutschke:

This is not about being against casinos. This is not being against the Koi Nation. **THIS IS BEING AGAINST THE MOST RIDICULOUS LOCATION SELECTION** for such an operation. The photo below is an actual/factual photograph of where the Koi Nation propose to build the largest California casino. Please view this photo and note the residential neighborhoods that surround the property owned by Koi Nation. One of those homes is mine. Not shown in this photo are the schools, churches and parks that also surround the area. The choice of this property to build the largest casino in California, drawing enormous crowds, was poor judgement.

I strongly urge the Bureau of Indian Affairs to assign a NO PROJECT determination for the site the Koi Nation has proposed.



Respectfully,

Lynn R. Darst

From: Michele Pagan <meesh.martin@icloud.com>
Sent: Sunday, December 22, 2024 8:50 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Shiloh resort and casino

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This email is to express my concerns over the proposed Koi nation casino in Windsor, CA. As a nearby resident, many environmental factors concern me. Traffic, pollution, safety at nearby schools, water, fire safety are only a few to mention. Please consider these and spare our area from this misplaced development.

Thank you very much for your serious consideration.

Michele Pagan
Wikiup Resident

From: Mark Greenwood <mjrgreenwood@icloud.com>
Sent: Sunday, December 22, 2024 9:08 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Casino NO!

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Hello,
Unbelievable how this county thinks we need another casino.
We can't afford the land, water runoff and especially the Water!
Please do not construct this Casino this area..
Thank you,
Mark Greenwood

Sent from my iPhone

From: Kay Hartman <jacknkay@sonic.net>

Sent: Sunday, December 22, 2024 9:38 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Say NO to the Reckless Koi Nation Casino Project in the Windsor Area

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Dear Mr. Broussard:

I am an extremely concerned citizen of Sonoma County, CA. I am strongly opposed to the proposed Koi Nation Casino Project near Windsor CA. I believe the location of this new casino will be an extremely harmful and dangerous addition to our community for several reasons:

1. Fire danger area where evacuation would be difficult given the narrow roads in that area;
2. The proposed casino property is too large for that area;
3. Increased traffic, noise, lights and crime;
4. Negative impact on the water tables due to frequent droughts as a result of Global Warming;
5. Environmental harm to flora and fauna in the area;
6. The location is extremely far away from the Koi Nation's aboriginal territory in Lake County
7. Sonoma County already has two large Casinos along the Hwy 101 corridor;
8. Depreciated property values;
9. Widespread opposition from federal, state, and local elected officials who represent the citizenry.
10. The local Indian Tribes were not consulted prior to planning the Koi Nation Casino in the Windsor area.

Please do not approve the addition of this Koi Nation in this specific area of Windsor. It will not benefit any citizens of that area. The integrity of this rural community needs to be preserved for future generations.

Sincerely,

Kay Hartman

2335 Nordyke Ave
Santa Rosa CA 95403

From: Sally Jacoby <sallyjacob@sbglobal.net>
Sent: Sunday, December 22, 2024 10:01 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Casino project

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This is a terrible idea .

I live in Wikiup about half mile from Shiloh Regional Park and enjoy walking to park and enjoying nature along with many from my neighborhood with children and strollers walking to beautiful park.

Casino does not belong.

Traffic congestion brings unwanted noise and pollution to my neighborhood.

This is bad idea for area and not wanted due to pollution and huge amount of construction and people that are destroying open space!

Please reject and let us enjoy our regional park.

Not good for wildlife already struggling with less areas in Sonoma County due to construction of what is left of open space,

Sent from my iPhone

From: carol casselman <carolkca484@gmail.com>

Sent: Sunday, December 22, 2024 10:27 AM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] the proposed casino near Windsor California sought by the Koi Nation

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Dear Mr Broussard,

I am contacting you to express my very strong opposition to this proposed casino.

We, here in Sonoma County already have two casinos, both successful and supportive of Sonoma county values and needs. Here we have huge concerns about the environment, including light pollution and water use. In our frequent droughts, we are asked to allow our landscaping to die, to plant native low water use yards, and to cut back our water usage. This is a huge project, and it will use a lot of water and greatly contribute to terrible fire evacuation issues when it is wildfire season. The residents of Sonoma do not want this built. There is just no up side.

Another issue seems to be the extremely tenuous historical connection of this tribe to land that they have purchased in a very rural and beautiful part of the county.

Please do not grant this request by the Koi nation. It will harm our environment, put a strain on our water, law enforcement and transportation services. There are enough casinos here. We do not need another one.

Thank you for taking my comments.

Best regards,

Carol Casselman
Sonoma County resident for 57 years.

From: Ernst <ernst_family@yahoo.com>
Sent: Sunday, December 22, 2024 11:41 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Shiloh Resort and Casino Project by Koi Nation

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December 21, 2024

Dear Mr. Chad Broussard and Amy Dutschke,

I am an extremely concerned citizen, Catherine Ernst, who lives in the wonderful community of Windsor, California. There is not enough space to list all the concerns of the damage that the Koi casino project will bring to our town. I will highlight my main concerns as a citizens who lives 1 mile on the same road as the casino would be built. My address is 136 Thrushwing Avenue, Windsor, CA. 95492.,

I would think and hope that the Bureau of Indian Affairs would always put the lives and security of American citizens ahead of nonindigenous nations trying to buy their way into a community. It is obvious that the Oklahoma Chicasaw Nation wants to make money, lots of money from the Koi. They are trying to buy the Koi's future profits by pushing their way into other states. Why on earth should the Oklahoma tribes be allowed to take away from the indigineous tribes of Sonoma County.

The fact that five Indian tribes, indiginous to Sonoma County, oppose the Koi Nations move should say volumns to the BIA. Also, opposed is our California Governor, state legislators, Congress members, U.S. Senators, our 5 Sonoma County Supervisors, and the Town council of Windsor, as well as the majority of Windsor's citizens.

It is unthinkable that a group of less than 100 members (Koi nation) would be allowed to distrust and change forever the community of Windsor and Larkfield. These two communities are bedroom communities with schools, homes, churches, local parks where children play sports. This planned casino would be right in the middle of these families. Plus it would be greatly impacting one of the two main freeway on/off ramps that services our town for daily travel and emergency evacuations.

Taken from the 2024 FEIS final report. "The total occupancy load of the Resort and Casino is 20,814. However, the total occupancy based on parking capacity is 9,191. There are 5,110 parking spaces on the entire property and nine bus parkingspaces. Based on figures provided, the average vehicle would contain 1.7 persons per vehicle for a total of 8,687people. There are nine bus parking spaces with 56 seats per bus which totals 504 persons." That's almost the population of our town.

When I looked at the traffic count for Shiloh and Old Redwood Hwy. in the November 2024 post., the information was from 2022 when life was still effected by the pandemic. Since then we have had two huge 4 story apartment buildings built on that corner and all of the traffic and pedestrian counts are wrong and exceedingly low compared to reality. Plus, another set of apartments is being built now 1 block from there. No matter what was stated in the final report by the Koi, whether 8000 or 20,000 more additional people with vehicles, it will make that part of our town a traffic jam daily and an extreme danger zone during emergency evacuation. **Please someone check the statistics given by the final report.** The statistics are not accurate or updated properly by December 2024 reality.

There has been no one, except an electricians' union, who is in favor of this Casino in this location. The electrician's union has been promised a contract if the casino is built. Most of those members do not even live in this town. Very short term gain even for them.

The Koi have not sufficiently addressed all the damage the casino would cause to our community. We are in a high fire danger zone. We are just coming out of a 10 year draught. Our natural resources of water, pollution both light and noise, drain on electrical power (we have had blackouts in the past years due to higher temperatures (global change) and too many people using electrical sources. The traffic added with the casino would make entering and exiting our town a nightmare. The Koi submitted a traffic count taken back during the pandemic. The responses the Koi have stated to claim they won't significantly impact our area are deceitful and inaccurate.

The wells they would be using for water for that casino and hotel would be quickly drained. Pruitt Creek would be covered by the parking structure. Every road surrounding those acres is one lane each way. Who is going to pay for the huge increase in safety costs and repairs needed to roads, extra city service personnel (fire, police, trash, etc.).

Bottom line, the location they have chosen is not appropriate for the size and type of business. The precedent that would be created by allowing a nonindigenous tribe to build and have a trust in an area they do not have a rightful claim to is against everything that the BIA should stand for. Protect the rightful indigenous pomo tribes who are already here and who built where they were not disrupting existing neighborhoods. The Koi need to look else where.

I pray you will do the just and reasonable thing decision for ALL.

Sincerely,

Catherine Ernst

From: j k <pinkladyrdsnpr@yahoo.com>
Sent: Sunday, December 22, 2024 12:06 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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December 22, 2024

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

RE: FEIS Comments, Shiloh Resort and Casino Project

I am writing to you both in the hopes that we, as a community, will come together and realize what a huge burden the above listed proposal will be for Windsor, CA. and Santa Rosa, CA. residence.

Moving from San Francisco, CA. (I definitely was a CITY Girl) to Sonoma County, (Windsor) over 30 years ago, I realized what a wonderful, friendly and beautiful community I call my home. As you know, this area still has open farm, ranch, vineyards and acreage for us ALL to enjoy whether its hiking, walking, biking, swimming etc. Windsor is a very family oriented small town where most of us know our neighbors and appreciate each other.

Our concern for this project goes deep. Across the street from the proposed casino is a well- established neighborhood, community church, community park and also homes with acreage. Traffic in Windsor is already a concern with technically only a couple of exits if there is another disaster which happened during the evacuations due to fires. I would hate to think of the safety problems if this were to occur again, even flooding or earthquakes. The extra traffic that this casino would bring would be a nightmare. The extra noise from traffic going to the casino and the bright lights would also be a hinderance to the neighborhoods as well. Safety, as far as people coming into our community is another big risk problem. There is always an element of danger, be it robbery (thefts), unmentionable people sleeping in our community park and drunk drivers leaving the casino at all hours. This will also put an extra amount of burden on our law enforcement personal.

As far as our environment, there will be more water usage, not mention our air quality. This casino will stick out like a sore thumb. Bus loads of people will be coming to Windsor/Santa Rosa and our wonderful town will turn into an unwanted cesspool.

Her Honor Judge Rita F. Lin issued a temporary restraining order on Friday, December 20, 2024 delaying any decision by the U.S. Department of the Interior. I have no reservations regarding the concept of Indian Casinos when the ancestral lands belong to the particular tribe. In this case, the said land is more than 50 miles from the Koi Nation homeland.

Please consider all of the above when making your decisions on this very important and pressing matter to the residence of Windsor, CA.

Thank you, Joyce Klein, 213 Deanna Pl., Windsor, CA, 95492

From: aghlaw@sonic.net <aghlaw@sonic.net>
Sent: Sunday, December 22, 2024 12:09 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation casino in Windsor

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Mr. Broussard:

I am a resident of Windsor, CA, and I'm writing about the proposed Koi Nation casino in (or immediately adjacent to) Windsor. I am vehemently opposed to this proposed casino being located in that place.

While my primary concern is about safety, as explained below, I want to briefly comment on the idea that the Koi Nation has any real connection with Windsor (and I understand that there are legal, technical issues that may muddle the actual purpose of the geographic connection idea). I have lived in Sonoma County for 34 years, and I have lived in Windsor for the last 32 years. I never heard any mention, ever, of the Koi Nation before this proposal. I have, of course, heard hundreds of things about the various Pomo tribes in this area – that is, the peoples that actually had and have a connection to Sonoma County, including Windsor (this includes efforts regarding tribal affairs in which I was engaged as a lawyer before my retirement). I read the Beltrans opinion piece in the Press Democrat regarding their historic connections to this area and, frankly, the argument was at best strained, and mostly came off as sticking out a tongue and saying “ha, this technical point is a winner, even if we know it is weak.”

That, of course, IS a technical issue. I am most worried about my safety, though. In 2019, we were given a few hours to evacuate as the Kincadee fire moved toward Windsor. I raced home, packed a few things, and then left my house – only to be stuck in traffic that barely moved as we inched the couple of miles toward the freeway entrance. As you surely know, Windsor has very limited freeway or other road access, especially leaving town. Adding a massive project which could add thousands of vehicles to the mix could cost lives in the next natural disaster to hit this town. I am retired and in my 70s, as are many of the local residents, and speedy actions are not easy (or, in some cases, possible) for some of us.

I have no objection to the Koi Nation being allowed to establish a casino or other development endeavor in Lake County, which would be the appropriate site for that tribal nation. I do object to location shopping that likely endangers those of us who actually have a connection to this area, as residents.

Thank you for your consideration.

Albert Handelman
707-291-8662

From: KEVIN WARREN <cajunce@comcast.net>
Sent: Sunday, December 22, 2024 12:43 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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FEIS comments

The FEIS report has numerous errors and sugar coats the harmful effects on the community and the environment. Listed below are a few of many items that are problems that have not been adequately addressed.

CRIME: Crime will increase and using a percentage of crimes per 1000 people is wrong. The larger number of people there are the result of the casino bringing in more people. The actual number of crimes will increase. Trafficking, assaults, theft and drunken driving will increase. Drunken driving is rated as LS (lightly significant) until someone dies. The mitigation suggested is inadequate. This casino would be horrible for the neighborhood across the street.

PROPERTY VALUES: The negative effect on property values is highly significant. The comparisons to a casino in Richmond (urban) and two casinos in Southern California (inland, one with a golf course) doesn't really give an indication of the Shiloh site. The subdivisions near Shiloh are in Wine Country and have different valuations. The FEIS does not have adequate mitigation or realistic analysis of the true effects on property values on nearby neighborhoods. A call to a local real estate agent trying to sell homes across the street will show the actual negative effect, NOT the contrived report on property values in the FEIS.

TRAFFIC; The traffic study was based on a limited study in July of 2022. There is no school in July and people are away on vacations. Traffic has increased dramatically since then as more people are going into work as the post pandemic era proceeds. Also with all the new projects underway traffic will be much worse. The mitigation recommendations will not solve the traffic problem the casino will bring. Adding a couple of turn lanes and re-striping is not nearly enough.

NOISE: The event center alone will create highly significant noise pollution to the nearby neighborhoods besides increased traffic. Amplified music will carry through to other neighborhoods. The noise from people arriving and leaving will be substantial. Noise carries a long way at night. The traffic noise alone will not be mitigated properly by asphalt changes. Construction noise is a huge issue that, once again, is erroneously being down played. Backup warning beeps on equipment carries for miles. 18 to 24 months to build will more likely be ~36 months.

ENVIRONMENTAL ISSUES; Storm water runoff with thousands of cars rated LS (lightly significant). With thousands of cars a day the run off of gas, oil and rubber is a big issue with inadequate mitigation in the FEIS. Ground water is a huge issue for the county in the future with global warming and the pumping of thousands of gallons a day is highly significant and the mitigation of more monitoring with the Town of Windsor after the fact is glossing over the problem. Monitoring of a problem does not solve or mitigate a problem. The waste water plan of putting tertiary treated waste water into Pruitt Creek is a bad idea.

There are many reasons that the Koi casino proposal is soundly rejected by the Governor of California, the Sonoma County Board of Supervisors, the Windsor Town Council and numerous other public officials. **The FEIS report of a positive economic benefit to the community is wrong.** Maybe positive \$\$\$ for the Koi and Chickasaw. The report is biased and basically written to get approval. **The ratings of different issues with LS and anemic mitigation recommendations do not properly reflect the overall harm to the community.** The constant use of BMP's (best management practices) does not solve problems.

This project would be detrimental to the surrounding community.

Crime, Traffic, Wildfire evaluations, noise, environmental concerns, and loss of property values are huge issues that make this project wrong for this site and horrible for the neighbors. Certainly Koi ancestors suffered wrongs but as the old saying goes two wrongs don't make a right. This reservation shopping by a Lake County tribe is not only is bad for Windsor but also bad for the original Sonoma County Native Americans.

This casino project should be rejected!

Thank you,
Kevin Warren
6181 Lockwood Dr
Windsor, CA

From: Anthony Sarto <anthonyfab777@att.net>
Sent: Sunday, December 22, 2024 1:03 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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December 21, 2024

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

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

Dear Regional Director Dutschke:

I am writing to you as a concerned citizen of Sonoma County, 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. Windsor is a wonderful place live. While I now live in Santa Rosa, I still own my home in Windsor and have many friends there. 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 reviewed multiple sections of the Final Environmental Impact Statement as well as the prior assessment from 2023. As expected, the documents serve as more of a justification for the project, in the spirit of dismissing the core, intuitive concerns of such a project. It offers very little conclusive perspective or summaries, but large amounts of data that very few individuals can process without significant expertise.

To summarize, to conclude that such a project won't have a significant impact on the actual lifestyle and environment of the neighborhood residents, is preposterous as well as insulting.

It is simply not credible to dismiss the impact 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. In general, any large development will likely increase crime, but this project has the added concern of capitalizing on the less honorable aspects of human behavior.

Traffic on Shiloh Road is already significant, but supporting the type of volume that a project like this will produce is untenable without major traffic infrastructure implementations. More lanes, more stoplights- these are unfortunate additions to any neighborhood. There will be large amounts of vehicles, trucks and busses travelling on Shiloh Road during the day and at night, with traffic likely backed up at Redwood

highway (which it already does) making it impossible for RESIDENTS (many actual property tax payers) 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.

Thirdly, noise will increase FOREVER, not just during the construction phase of the project. 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 questions 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.


Sincerely,

Anthony W. Sarto, Ph.D., Terri Sarto & Family
8085 Foothill Ranch Road, Santa Rosa, CA 95404
5830 Gridley Drive, Windsor, CA 95492
12/21/2024

From: Robert Lyons <lyonsking5150@me.com>
Sent: Sunday, December 22, 2024 3:38 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] "northern California Pomo alliance vs KOI Nation"

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Open my shared note:

 **northern California Pomo alliance vs KOI Nation**
Notes

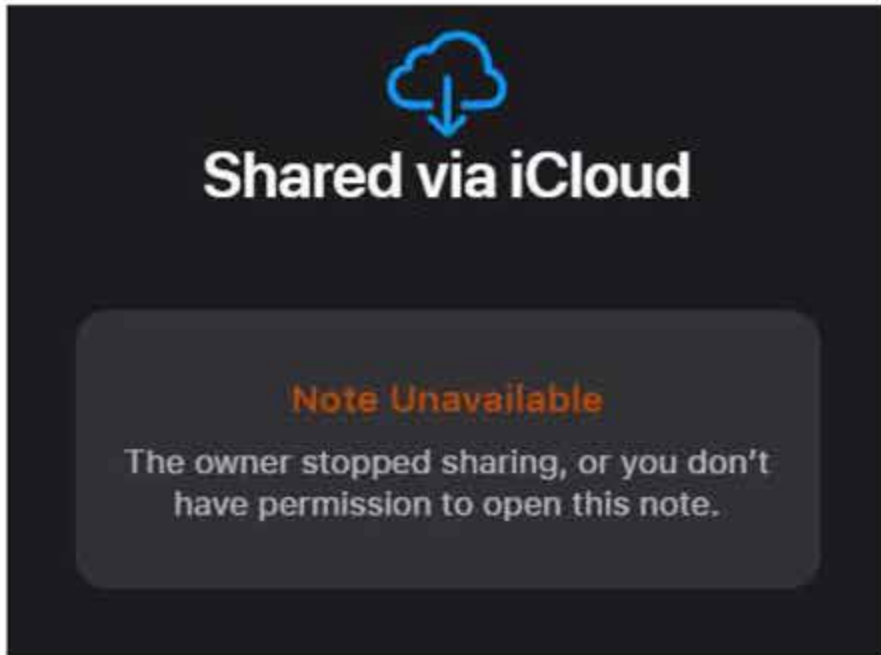
Chad Broussard, environmental protection, specialist, bureau of Indian affairs

Mr Broussard,

My name is Robert Sr I am a citizen of Windsor, California and a member of the Lytton band of Pomo Indians. As to the proposal to koi nation casino/hotel project I am strongly opposed as this tribe is not even from Sonoma County. They are from Clearlake and several officials are not in favor of this, including our governor Newsom as well as officials of Windsor per the Jarad Huffman's Legislative bill in 2017

A couple years ago when my tribe the Lytton band of Pomo Indians put our land into trust we had to agree with the town of Windsor not to put a casino in. I am extremely appalled at the methods of Bryan Newland helping koi nation fast track this motion through in the light of the AB52 Law Suit.

Sent from my iPhone



From: Elizabeth McKee <famizon@sonic.net>
Sent: Sunday, December 22, 2024 2:04 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation casino proposal

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Dear Mr. Broussard,

I am writing to express my strong opposition to the Koi Nation's proposal to build a casino near Windsor, California. My objections are based on my personal familiarity with the area and my firm conviction that this is a serious accident waiting to happen if this casino were to be built.

The roads in this proposed area are narrow and winding and quite a distance from Highway 101 and larger broader boulevards more compatible with the amount of traffic that a casino will attract. In addition, another layer of concern involves people getting trapped in this area in the event of a catastrophic fire such as the Tubbs Fire of 2017 and the Glass fire of 2019. I lived through both of these fires and was evacuated to the Sonoma County Fairgrounds in 2017 and shortly before the Glass fire burned a house down 1/4 mile from where I live.

Highway 12 which runs east/west through Santa Rosa was so congested from residents of Oakmont, a retirement community near where I live, trying to escape flames that were already burning homes there, that traffic essentially stopped while the fire jumped Highway 12 as residents were trying to escape. I myself was ordered to leave my home and encountered a line of stopped cars attempting to reach the safety of the Sonoma County Fairgrounds again.

The increased traffic because of the casino will disrupt parents driving their children to and from school and interrupt their ability to get to work on time. As Sonoma County has grown and expanded traffic snarls have increasingly diminished the quality of life here. This casino will only add to this problem and pose undesirable threats to our beloved wildlife here.

We in Sonoma County are very proud of our beautiful parks and open space lands we are carefully preserving for our future generations and the precious deer, bob cats, lions, foxes and other species we cherish here. Increased traffic, congestion, cars, trucks and noise will pose a threat to these animals that we should not have to confront given the fact that the Koi Nation does not really trace its origins in this county and therefore has a weak claim to be here.

I personally see the heart breaking reality of these realities driving on Montgomery Drive on a daily basis. Montgomery Drive is bordered by trees and privately owned land with a year round creek running through it. It provides a home for a herd of deer that delight us when we see them. Unfortunately, people speed on Montgomery Drive, ignoring the posted speed signs and frequently strike and kill the young deer who are trying to cross the road. I saw 3 dead young deer on the road in a 6 week period two months ago as the deer were adjusting to the seasonal changes that affect their habitat.

I would hate to see Windsor have to experience a similar negative impact to their wildlife from the building of a new unnecessary casino and grieve the losses of these animals we are so proud of here.

I vote NO on the question of the Koi Nation building a casino in this county.

Thank you for your time to consider my comments.

Yours truly,

Elizabeth McKee
5555 Montgomery Drive C203
Santa Rosa, Ca. 95409

From: rmoldy@aol.com <rmoldy@aol.com>
Sent: Sunday, December 22, 2024 3:25 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino

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Please understand the local population is against allowing this new casino to go in!!! We have already been through the additions of two larger casinos here (Graton and River Rock) that put out of business the smaller ones that were true Indian owned/operated casinos before them and farther away from the main populations here. Now that Graton has become a HUGE massive casino, another group of Indians are trying to add another super HUGE casino to the small town of Windsor. This county/area DOES NOT WANT ANY MORE CASINOS!!! We have far too large of ones already. If this is allowed, we become a 2nd Las Vegas and we DON'T WANT THAT!!! **THE LOCALS HERE WILL NOT FREQUENT MORE MASSIVE INDIAN CASINOS, which means more bus loads of out of the area people, on small, 2 lane roads all around the area!!!** This is also being planned in a very fire prone area which would make it incredibly dangerous for evacs in the event of another massive wildfire that we've all had to endure too often already!!! Many would die. This land is way far from the Koi Nation aboriginal territory and shouldn't ever have been allowed for them to build here. We are also deeply concerned that the Koi Nation did NO OUTREACH on the impact this would have on both the other two Indian casinos as well as the local people!!! They don't care what harm it does - they've proven that now. They don't care that ALL OF US IN THIS COUNTY ARE SICK AND TIRED OF MORE INDIAN CASINOS BEING ALLOWED TO BUILD HUGE CASINOS HERE!!!! **WE DON'T WANT THEM AND WON'T BE FREQUENTING THEM SO WHAT GOOD IS IT TO ALLOW THE MASSIVE BUILDINGS TO EVEN GO IN???**

Please, PLEASE don't allow this!!!! Have some respect and caring for what the local people here want!!!!!! We have enough problems here already, with too few police, fire dept. personnel to take this all on!!!!!! No one wants it here!!!!!!

Thank you for considering our perspectives.

Mr. and Mrs. Moldenhauer

From: Carolyn Williams <williams.carolyn41@gmail.com>
Sent: Sunday, December 22, 2024 4:41 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Cc: Williams Carolyn <williams.carolyn41@gmail.com>
Subject: [EXTERNAL] Koi Nation Casino

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Increased traffic, noise, crime...drinking and driving by customers.

Depreciated property values....ruining neighborhoods

Area doesn't need another casino.....gambling can be a bad addiction....

Please no casino....River Rock is close enough and barely exists....Sent from my iPad

From: Carol Areyano <nicole.cazares022213@gmail.com>

Sent: Sunday, December 22, 2024 5:22 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Letter against Koi Nation Project

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Hi there,

Below is the letter I've attached expressing my concern against the Koi Nation Casino Project. Thank you kindly.

December 22, 2023

To whom it may concern,

I would like to express the gratitude & hard work Margie Mejia has put together within our community of Santa Rosa along with Windsor Hills. Her legacy is known around our community & the Koi Nation Casino Project will bring disruption not only to citizens but also to the Lytton Rancheria Tribe. It's been very peaceful being part of this community sharing with the tribe. There's been plenty of kind support from Margie Mejia & the Lytton Rancheria tribe who are known for keeping our community safe, well kept together with landscaping, & keeping a firm stand to protect all areas here in our town.

It will be devastating to our community if the Koi Nation Casino Project is awarded the ability to build their properties within our land & other communities around. Margie Mejia's legacy is well known throughout all our community areas. For this project to happen it will not present as being a customary well friendly development in which Margie Mejia has strived within many years of hard work for our whole communities.

According to AB 52 of the tribal consultation, "A tribe that is traditionally and culturally affiliated to the geographic area where a project is located must have requested that the lead agency in question provide notification to the tribe of projects in the tribe's area of traditional and cultural affiliation." Koi Nation Casino Project is prohibited from Lytton Rancheria Tribal Land to build any of their properties within our community. The Koi Nation Casino Project is in no way afflicted with Lytton Rancheria Tribe. This is the first having to learn about this tribe interrupting our economic & surrounding areas.

Furthermore AB 52 should protect this Koi Nation Casino Project from not moving forward on the geographic area of Lytton Rancheria Tribal land. This project has brought much distress to our community especially if it will be granted. Our communities will no longer be at peace & will not be known for the great devotion Margie Mejia brought to our social values.

Thank you Kindly,

Former resident within Santa Rosa, Ca

From: Dee Jeffers-Kalder <deemjk@gmail.com>
Sent: Sunday, December 22, 2024 7:45 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Windsor casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am a Windsor, CA resident, and this is a family community.
The proposed location is along a narrow country road. Problems of traffic, congestion, noise, decreased home prices, and crime will have a negative impact on quality of life for the people living in this community.
We DO NOT need to have yet another casino in this area!

Donna Jeffers-Kalder, RN

From: William Cramer <willyc1@icloud.com>
Sent: Sunday, December 22, 2024 7:52 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Hello,

I am writing as a resident near to the proposed Casino on Shiloh Road. My home is in the Larkfield-Wikiup community approximately 2 miles from the Casino site. The project is located very close to two popular public parks. Esposti Park and Shiloh Ranch Regional Park. These parks showcase the activities enjoyed by both locals and tourists to the region. Esposti Park is a popular meeting place for organized bike rides and both Shiloh and Faught Road are used frequently by bike riders. They form part of many favorite bike rides in this area. Shiloh Ranch Park is very popular with hikers and provides access to wildlife enjoyed by locals and tourists alike. Both of these valuable resources which contribute to the quality of life in this area would be severely impacted by the proposed development.

There is no society in the history of the world that has considered gambling anything but harmful for people. Promoting the construction of a casino in order to compensate for evils of the past is misguided and the worst kind of government irresponsibility.

William Cramer

From: suzibill <suzibill@sonic.net>
Sent: Sunday, December 22, 2024 7:59 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Shiloh Resort/Casino

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Chad Broussard
Environmental Protection Specialist, BIA

Dear Mr. Broussard,

I am a resident of Sonoma County CA., and live a mile and a half from the proposed Koi Nation casino/resort site. I believe that the location, scale and nature of this project is a major threat to me and my community.

We who live here are at on-going threat from fast moving, wind driven wild fires and on-going drought. The huge negative impact this project represents to our diminishing water table and to our ability to safely evacuate as needed is frightening. I personally have had to evacuate twice, in 2017 and 2019, and had a third fire coming within one evacuation zone away from my home in 2020. The first time was terrifying - awakened at night, seeing flames on the hill above my house, fleeing in my car, then getting stuck in gridlocked traffic. We now have planned evacuation routes. But the huge recreational project proposed at Shiloh and Old Redwood Highway in Sonoma County would overrun a major evacuation route and put us all in grave danger- including anyone who was at the resort/casino. This is one of several major reasons that this project is wrong for this location.

Drought/water supply is another major issue. I have read the environmental report and the mitigation measures outlined. However, even if wells exist or are drilled within the property, the large amount of water needed to sustain the structure and the thousands of people coming there, would severely deplete the already receding water table. Last year, Windsor residents were put on a mandatory 20% water reduction. Given the climate predictions, it is clear that water reduction rules will be needed over and over again in both the near and longer term.

Research has consistently linked casinos with higher crime rates including theft, drunk driving and violent crime. The location of Koi proposed site is directly across the street from a family neighborhood and a Little League park. There is a new apartment complex diagonally across the street. A church is across another street and a grade school is just over a mile away. Clearly, this is the absolute wrong location for a gaming operation and its inherent issues.

Other concerns related to demands on local infrastructure, law enforcement, and negative impacts on environment and wildlife have been noted by others. The ones I've noted are the ones that are highest on my mind and in my life. I thank you for your time in reading this letter.

Respectfully,

Suzanne Malay

suzibill@sonic.net

From: melissa anderson <bluecatplace@yahoo.com>
Sent: Sunday, December 22, 2024 8:44 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Melissa Giorgetti -Anderson
5830 Monte Verde Rd.
Santa Rosa, CA 95409

bluecatplace@yahoo.com

12/22/24

Dear Mr. Broussard,

I am writing in regards to the Koi Nation Shiloh Resort and Casino Project. I am not a Windsor resident, but I have deep roots in the Windsor community. I am a teacher in the Mark West Union School District, which has four schools that border Windsor. One such school, San Miguel Elementary, is on Faught Rd. A casino on Shiloh Rd. will impact the area of Mark West Springs Rd., Old Redwood Highway, Faught Rd., and Shiloh Rd. I am not only concerned with traffic in the area, but security around these four schools. Studies have found higher rates of all type of violent crime in areas of high-density residential land use, even after controlling for overall populations. The Shiloh Resort also borders the soft ball field where my grandchildren play on their Windsor little league teams on Saturday and Sunday mornings. Finally, I frequently hike Shiloh Park. I hike after a long day of work teaching Mark West Elementary students, and I often meet my hiking friends at Shiloh Park on weekends, as it is central to where we all live. It is beautiful out there, and a real treasure. It would be devastating to this area that I, and so many others, call home. Please consider rejecting this project.

Thank you for your time.
Sincerely,
Melissa Giorgetti-Anderson

From: Patricia Biggi <cpbg@sbcglobal.net>
Sent: Sunday, December 22, 2024 10:11 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard,

I am a Tribal Citizen of the Federated Indians of Graton Rancheria, and the purpose of this letter is to express my opposition to the Koi Nation of Northern California's project to establish trust land for gaming in Sonoma County, California.

The Koi Nation, previously known as the Lower Lake Rancheria, submitted a restored lands gaming application to the U.S. Department of the Interior (DOI) for a parcel located outside the Town of Windsor, in Sonoma County. The proposed project location is over a 50-mile drive from the Koi Nation's ancestral and cultural roots in the Lower Lake area of Lake County, where its historic rancheria was located.

DOI is supposed to protect tribal sovereignty and this precedent setting proposal by the Koi Nation is actually *undoing* tribal sovereignty. DOI is now being put in the position of pitting Indians against Indians here in California. Our tribes were not removed from their ancestral homelands, like tribes in Oklahoma. In California, tribes were not removed but were decimated in place. As my Tribe and others rebuild, our Tribal Citizens are returning to their ancestral territories.

DOI must consider an alternative location for the Koi Nation in their true homeland in Lake County. DOI would be wrong to allow for Koi Nation to jump into another tribe's territory by trying to demonstrate a significant historical connection to our Southern Pomo territory based on trade routes or one family moving to our territory. Koi Nation's application is simply a new twist on their previous efforts to acquire gaming sites *outside* of their ancestral territory, which DOI was correct to deny on the same grounds. I support the right of all tribes to restore their homelands and pursue gaming on those lands. I cannot, however, support this project. It undermines tribal sovereignty and would be to the detriment of the identity, sovereignty, and cultural rights of the federally recognized tribes in Sonoma County.

I would greatly appreciate you considering another location for the Koi Nation casino in their ancestral territory in Lake County. Otherwise, this project should be denied.

Respectfully,

Patricia Biggi
14839 Morrison Street
Sherman Oaks, CA 91403

From: Patricia Biggi <cpbg@sbcglobal.net>
Sent: Sunday, December 22, 2024 10:13 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr. Broussard,

I am a Tribal Citizen of the Federated Indians of Graton Rancheria, and the purpose of this letter is to express my opposition to the Koi Nation of Northern California's project to establish trust land for gaming in Sonoma County, California.

The Koi Nation, previously known as the Lower Lake Rancheria, submitted a restored lands gaming application to the U.S. Department of the Interior (DOI) for a parcel located outside the Town of Windsor, in Sonoma County. The proposed project location is over a 50-mile drive from the Koi Nation's ancestral and cultural roots in the Lower Lake area of Lake County, where its historic rancheria was located.

DOI is supposed to protect tribal sovereignty and this precedent setting proposal by the Koi Nation is actually *undoing* tribal sovereignty. DOI is now being put in the position of pitting Indians against Indians here in California. Our tribes were not removed from their ancestral homelands, like tribes in Oklahoma. In California, tribes were not removed but were decimated in place. As my Tribe and others rebuild, our Tribal Citizens are returning to their ancestral territories.

DOI must consider an alternative location for the Koi Nation in their true homeland in Lake County. DOI would be wrong to allow for Koi Nation to jump into another tribe's territory by trying to demonstrate a significant historical connection to our Southern Pomo territory based on trade routes or one family moving to our territory. Koi Nation's application is simply a new twist on their previous efforts to acquire gaming sites *outside* of their ancestral territory, which DOI was correct to deny on the same grounds. I support the right of all tribes to restore their homelands and pursue gaming on those lands. I cannot, however, support this project. It undermines tribal sovereignty and would be to the detriment of the identity, sovereignty, and cultural rights of the federally recognized tribes in Sonoma County.

I would greatly appreciate you considering another location for the Koi Nation casino in their ancestral territory in Lake County. Otherwise, this project should be denied.

Respectfully,

Nicole Biggi
14839 Morrison Street
Sherman Oaks, CA 91403

From: Patricia Biggi <cpbg@sbcglobal.net>
Sent: Sunday, December 22, 2024 10:15 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Road 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,

I am a Tribal Citizen of the Federated Indians of Graton Rancheria, and the purpose of this letter is to express my opposition to the Koi Nation of Northern California's project to establish trust land for gaming in Sonoma County, California.

The Koi Nation, previously known as the Lower Lake Rancheria, submitted a restored lands gaming application to the U.S. Department of the Interior (DOI) for a parcel located outside the Town of Windsor, in Sonoma County. The proposed project location is over a 50-mile drive from the Koi Nation's ancestral and cultural roots in the Lower Lake area of Lake County, where its historic rancheria was located.

DOI is supposed to protect tribal sovereignty and this precedent setting proposal by the Koi Nation is actually *undoing* tribal sovereignty. DOI is now being put in the position of pitting Indians against Indians here in California. Our tribes were not removed from their ancestral homelands, like tribes in Oklahoma. In California, tribes were not removed but were decimated in place. As my Tribe and others rebuild, our Tribal Citizens are returning to their ancestral territories.

DOI must consider an alternative location for the Koi Nation in their true homeland in Lake County. DOI would be wrong to allow for Koi Nation to jump into another tribe's territory by trying to demonstrate a significant historical connection to our Southern Pomo territory based on trade routes or one family moving to our territory. Koi Nation's application is simply a new twist on their previous efforts to acquire gaming sites *outside* of their ancestral territory, which DOI was correct to deny on the same grounds. I support the right of all tribes to restore their homelands and pursue gaming on those lands. I cannot, however, support this project. It undermines tribal sovereignty and would be to the detriment of the identity, sovereignty, and cultural rights of the federally recognized tribes in Sonoma County.

I would greatly appreciate you considering another location for the Koi Nation casino in their ancestral territory in Lake County. Otherwise, this project should be denied.

Respectfully,

Charlie Hardin, Jr.
2006 Ludwig Avenue
Santa Rosa, CA 95401

From: Patricia Biggi <cpbg@sbcglobal.net>
Sent: Sunday, December 22, 2024 10:22 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, 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,

I am a Tribal Citizen of the Federated Indians of Graton Rancheria, and the purpose of this letter is to express my opposition to the Koi Nation of Northern California's project to establish trust land for gaming in Sonoma County, California.

The Koi Nation, previously known as the Lower Lake Rancheria, submitted a restored lands gaming application to the U.S. Department of the Interior (DOI) for a parcel located outside the Town of Windsor, in Sonoma County. The proposed project location is over a 50-mile drive from the Koi Nation's ancestral and cultural roots in the Lower Lake area of Lake County, where its historic rancheria was located.

DOI is supposed to protect tribal sovereignty and this precedent setting proposal by the Koi Nation is actually *undoing* tribal sovereignty. DOI is now being put in the position of pitting Indians against Indians here in California. Our tribes were not removed from their ancestral homelands, like tribes in Oklahoma. In California, tribes were not removed but were decimated in place. As my Tribe and others rebuild, our Tribal Citizens are returning to their ancestral territories.

DOI must consider an alternative location for the Koi Nation in their true homeland in Lake County. DOI would be wrong to allow for Koi Nation to jump into another tribe's territory by trying to demonstrate a significant historical connection to our Southern Pomo territory based on trade routes or one family moving to our territory. Koi Nation's application is simply a new twist on their previous efforts to acquire gaming sites *outside* of their ancestral territory, which DOI was correct to deny on the same grounds. I support the right of all tribes to restore their homelands and pursue gaming on those lands. I cannot, however, support this project. It undermines tribal sovereignty and would be to the detriment of the identity, sovereignty, and cultural rights of the federally recognized tribes in Sonoma County.

I would greatly appreciate you considering another location for the Koi Nation casino in their ancestral territory in Lake County. Otherwise, this project should be denied.

Respectfully,

Darlana Hardin
7681 Averill Road
Sebastopol, CA 95472-4702

From: Bob Hobbs <Bob@Hobbs.org>
Sent: Sunday, December 22, 2024 10:29 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] KOI Nation Casino

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The subject of the KOI Nation and their desire to have land set in trust for their reservation has been a hot topic here in Windsor. This great need for a reservation miles from their former homeland is a bunch of BS.

What we have here is a hand full of Indians that want to be millionaires. They found someone to front them the money to buy land and have cut a deal with a Midwest Indian tribe to build and manage a Casino for them. It makes no difference to them where the land is located or what the impact will be on the surrounding community, they are just money hungry. This Casino will significantly impact the area and destroy local property values as no one will want a home near a humongous Casino.

I have lived in Windsor for the last 28 years and feel that a third Casino within 30 minutes driving time is ridiculous and a Casino is what this is really all about.

Robert Hobbs
359 Boden Pl.
Windsor, CA

From: Patricia Biggi <cpbg@sbcglobal.net>
Sent: Sunday, December 22, 2024 10:30 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, 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,

I am a citizen of Sebastopol, California, and the purpose of this letter is to express my opposition to the Koi Nation of Northern California's project to establish trust land for gaming in Sonoma County, California. The Koi Nation, previously known as the Lower Lake Rancheria, submitted a restored lands gaming application to the U.S. Department of the Interior (DOI) for a parcel located outside the Town of Windsor, in Sonoma County. The proposed project location is over a 50-mile drive from the Koi Nation's ancestral and cultural roots in the Lower Lake area of Lake County, where its historic rancheria was located. DOI is supposed to protect tribal sovereignty and this precedent setting proposal by the Koi Nation is actually *undoing* tribal sovereignty. DOI is now being put in the position of pitting Indians against Indians here in California. California tribes were not removed from their ancestral homelands, like tribes in Oklahoma. In California, tribes were not removed but were decimated in place. DOI must consider an alternative location for the Koi Nation in their true homeland in Lake County. DOI would be wrong to allow for Koi Nation to jump into another tribe's territory by trying to demonstrate a significant historical connection to our Southern Pomo territory based on trade routes or one family moving to our territory. Koi Nation's application is simply a new twist on their previous efforts to acquire gaming sites *outside* of their ancestral territory, which DOI was correct to deny on the same grounds. I support the right of all tribes to restore their homelands and pursue gaming on those lands. I cannot, however, support this project. It undermines tribal sovereignty and would be to the detriment of the identity, sovereignty, and cultural rights of the federally recognized tribes in Sonoma County. I would greatly appreciate you considering another location for the Koi Nation casino in their ancestral territory in Lake County. Otherwise, this project should be denied.

Respectfully,

Charles Hardin, Sr.
7681 Averill Road
Sebastopol, CA 95472-4702

From: Cynthia Jimenez <cynjimenez0323@gmail.com>
Sent: Sunday, December 22, 2024 10:37 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Letter of opposition

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Dear Members of the Windsor Town Council,

I am writing to express my strong opposition to the Koi Nation's proposal to build a casino in Windsor, CA. While I deeply respect the rights of Native American tribes to pursue economic development, I believe that this project would have negative and far-reaching consequences for our community, environment, and local economy.

1 Traffic and Infrastructure Strain

Windsor is a small town with limited infrastructure, and the construction of a large casino would place an enormous strain on our roads, public services, and emergency response systems. Increased traffic congestion, particularly on already busy routes like Highway 101, would lead to more accidents, longer commute times, and a decline in quality of life for local residents.

2 Environmental Impact

Windsor is known for its natural beauty and commitment to sustainability. The development of a large casino and associated facilities threatens our local environment, including possible damage to surrounding open spaces, water resources, and wildlife habitats. The environmental footprint of such a development would be incompatible with the values that Windsor residents hold dear.

3 Social and Economic Consequences

Casinos often bring about negative social impacts, such as increased gambling addiction, crime, and financial strain on vulnerable populations. Furthermore, the promise of jobs created by the casino is often overstated. Many of these jobs may be low-wage, with limited long-term benefits for the community. Local businesses could also suffer as people choose to spend their money at the casino rather than supporting small, family-owned establishments in Windsor.

4 Community Impact and Quality of Life

Windsor is a town that prides itself on its family-friendly atmosphere and vibrant community. A casino would introduce an element of risk and undesirable behavior that could detract from the quality of life for our residents. It would alter the character of our town and negatively affect our ability to maintain a welcoming environment for families, tourists, and new businesses.

I urge the Windsor Town Council to carefully consider the long-term impacts of this project and prioritize the well-being of the community over short-term economic interests.

Thank you for your time and consideration.

Sincerely,

Cynthia Jimenez

cynjimenez0323@gmail.com

2098143796

Sent from my iPhone

From: Jessica Shears <shearsj22@yahoo.com>
Sent: Sunday, December 22, 2024 10:50 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Letter to Oppose Kio Nation Casino

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To Whom It May Concern,

I am writing to voice my strong opposition to the proposed casino development by the Koi Nation on ancestral Pomo lands in Windsor, CA. This project not only disrespects the indigenous history of this site but also disregards the voices of the native Pomo people who are the rightful stewards of this land.

It is deeply offensive that a tribe from another county, with no historical ties to these lands, would pursue a project of this magnitude on sacred territory. The Koi Nation's actions undermine the cultural and historical significance of the area, demonstrating a lack of understanding or respect for the indigenous people who have fought tirelessly to preserve their heritage and homeland.

This proposed casino places our community's stability and well-being at significant risk:

-

Economic and Physical Risks: Our recently reclaimed homeland, which represents years of struggle and progress, is now jeopardized by this project. The casino could destabilize the economic gains we have achieved and strain local resources.

-

Widespread Opposition: The project has been met with strong resistance from federal, state, and local leaders, including Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, State Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson, and U.S. Senator Alex Padilla. Their shared concerns underscore the negative impacts this development would bring to our community.

-

Community Disruption: Increased traffic, noise, and crime are inevitable outcomes of a casino of this size. These disruptions will erode the quality of life for residents and strain local infrastructure.

-

Environmental Damage: The proposed project poses a significant threat to the region's natural environment. Construction and ongoing operations risk damaging local ecosystems that are integral to the identity and sustainability of this area.

•

Property Value Depreciation: The casino's presence will negatively affect surrounding property values, diminishing the financial security of countless families.

The Koi Nation's push to build a casino on sacred Pomo lands is an affront to our shared history and heritage. This project does not honor the significance of these lands, nor does it consider the profound harm it would cause to our community and its future.

I urge decision-makers to stand with the local indigenous people and the broader community in opposing this project. Together, we must prioritize cultural respect, environmental stewardship, and the preservation of our collective heritage over external commercial interests.

Thank you for your attention to this critical matter. I am available to discuss these concerns further and provide additional insights as needed.

Sincerely,
Romeo Steele

[Sent from Yahoo Mail for iPad](#)

From: serena corona <serena.corona14@gmail.com>
Sent: Sunday, December 22, 2024 10:58 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino & Shiloh Resort Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Chad Broussard,

My name is Serena Corona and I am a member of the Lytton Rancheria Band of Pomo Indians. I'm writing this to you in opposition to the Koi Nation Casino Project. In my early years of life, I remember wishing I could have what the kids at school did. That I could ride in cars like them one day, because I had to walk and ride the bus. I dreamed of getting my own room and not sleeping on a cold hard floor. Opening up a full fridge of food was another dream of mine. We struggled with basic needs up until I was 8 years old. Our tribe worked hard and jumped through hoops to establish our casino. They had to agree to build a casino 50 miles away from our land to be able to put our land into trust. I remember hearing about the house our tribe was going to have built for us when I was 12 years old. I am 26 now and we only just moved into our housing in the beginning of 2024. It took them 14 years to be able to get our housing built. My auntie Margie Mejia and former chair woman poured her heart into bettering the lives of her people. In October of 2022 she tragically passed away and left us devastated. If it is decided that this casino will be built, it would take away from all the hard work she put in for her people. It is wildly unreasonable for them to keep going into areas that are not their native land and trying to build a casino. Dry Creek Rancheria Band of Pomo Indians, Kashia Band of Pomo Indians, Federated Indians of Graton Rancheria and Cloverdale Rancheria Band of Pomo Indians stand with us in opposition to this catastrophic business plan. This will drastically change our beautiful quiet town of Windsor. This will increase criminal activity in our area and pose a threat to the safety of children and people in our community. This will negatively impact our future generations and economical well being. Not only our tribe will suffer but many others in our area. There are federal, state, and local elected officials that oppose this project as well. The governor of California Gavin Newsom, U.S senator Alex Padilla, State Senator Mike McGuire, U.S representative Mike Thompson, Congressmen Jared Huffman, The Windsor Town Council, and Sonoma County Board of Supervisors are the elected officials in opposition to the Koi Nation Casino and Resort project. I want to know the streets and people of our city will be safe. I want our future generations to be able to thrive in a healthy safe and fruitful environment and economy just as I did. I hope all cons will be considered as this project shouldn't be established in an area where gaming hasn't been and should never be allowed.

Sincerely,

Serena Corona
9695 Abalone cir
Windsor CA 95492

From: Victoria Lopez <victoriasuee@yahoo.com>
Sent: Sunday, December 22, 2024 11:21 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Opposition to Koi Nation

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Victoria Lopez
9692 Abalone Circle
Windsor, CA 95492
707-951-4368
VictoriaSuee@yahoo.com

Chad Broussard
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

My name is Victoria Lopez and I am a tribal member of Lytton Rancheria Band of Pomo Indians. I am writing in the opposition of the Koi Nations proposed casino. There has been not only such a rush to approve this but also a obvious disregard of the local tribes. I moved my family down to Windsor a little over a year ago in hopes of connecting with my cultural roots and opening my family to better opportunities. My husband and I long talked about raising a family here and then to be blessed with tribal housing we finally jumped at the opportunity. Within the last year we have gotten comfortable within the community, participating in local things and my husband starting to coach basketball at the local high school, all while being able to be close to my own family and start to learn more of my culture so I can continue to pass the knowledge down to my own. We have started to love this community and everything that it has to offer, including all the family friendly events that the town puts on regularly.

With that being said I would like to go into how this casino would be disastrous for this community. Firstly, the local tribes have been ignored during this while process. All local tribes have been vocal about how not only is the Koi Nation of Lake County intruding on Native land that is not theirs, that they have no cultural or historical ties to but that they are not wanted while we continue our own connection to our roots that belong here. There has also been such large opposition from the Governor, the Sonoma County Board of Supervisors, the Windsor Town Council, Senator Mike McGuire, Congressmen Jared Huffman and Mike Thompson and U.S. Senator Alex Padilla and the many local voices of the town of Windsor. My Chairwoman, Margie Mejia fought for over a decade for us to be able to return to our homeland and was finally victorious but unfortunately passed before she could ever see the fruit of her labor. It feels incredibly insulting that she went through all that and fulfilled her promise to us only to have it put in jeopardy in under a year from a tribe that does not belong here.

Within the year of living here we have truly discovered how small town Windsor is and bringing in a casino would end that. The family friendly events held regularly in downtown would not be able to occur anymore, the price of homes here would decrease, traffic would increase along with noise and crime. This town is not made to sustain a massive casino that will only bring more problems. It would be built incredibly close to family homes, including my own sister-in-laws, grocery stores and close to my own nieces schools. The traffic alone would be unbearable as most streets here are suburban roads that are already filled with local families that can barely hold it all now. Including bringing in who knows how many people who would choose to be under the influence and drive around our community all while the town prides itself on being a bike/walking friendly community.

The environmental side of this is an issue of its own. We live in a high wildfire prone area that has seen extreme fires in recent years. How would you expect locals to be able to evacuate safely while adding in hundreds of tourists in a already congested community? The winds here cause fires to move so quickly that the casino would do nothing but clog evacuation routes even more than they already are while possibly being in the way of some of the homes on that side. We also are very drought prone, as we are in one now. The amount of water the casino would use would highly affect the community and cause even more water shortages than we've seen in the past. All while the community would be told to conserve water the casino would be filled with people who do not care and would not be held to same the standard and the Koi Tribe would also be unaffected because they are not from here and do not have families that reside here. In the winter when we do get rain, it floods extremely easily. Roads here become impassable for days causing even more traffic, accidents and problems for local families. The Shiloh exit was just recently flooded for days making downtown Windsor the only way in and out causing many problems and delaying traffic by up to an hour. As I said before the environmental side of this would be terrible especially for those of us that make this commute every day.

I would also like to again state that the Koi Nation is not from Windsor or even Sonoma County. They are the Koi Nation of Lake County and trying to invade on land that they have no ties to whatsoever. The local tribes would be erased as people would soon start to say that this is where the Koi Nation is from. It is disrespectful and infuriating that we have to fight and defend ourselves against a tribe that has its own land and its own home. My tribe fought for over a decade to just be able to return home to reconnect and raise our own families on our land but it feels like a non-local tribe who only wants to come to make money can do so freely.

Thank you for taking time to read my email and please take into consideration everything myself and everyone has had to say in opposition of this. We hope that you think of not only our Tribe when making this decision but the community as a whole.

Victoria S. Lopez

From: Tom Jimenez <jimen7@comcast.net>
Sent: Sunday, December 22, 2024 11:33 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Opposition to the Koi nation Casino in Windsor, ca

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I am writing to express my strong opposition to the Koi Nation's proposed casino project in Windsor, Ca. I believe this project will have detrimental consequences for local residents, the environment, and the rights of Indigenous peoples who have historical and cultural ties to this land.

1. Disregard for Indigenous Rights It is deeply troubling to see a tribe from a completely different county, with no historical ties to the land in question, attempting to develop a casino on land that rightfully belongs to the native peoples of this area. The voices of the local Indigenous community have been ignored, and this project represents an encroachment on their rights and heritage.

2. Threat to the Community and Homeland

The potential impact of this project on the Lytton community cannot be overstated. The establishment of a casino would put recently established homeland of the Lytton tribe and everything they have fought so hard to protect at risk. The social, economic, and environmental consequences would be far-reaching, affecting local residents, property values, and our quality of life. This project would lead to increased traffic, noise, and crime, all of which would harm the character of our community.

3. Widespread Opposition from Elected Officials

There is overwhelming opposition to the Koi Nation casino project from elected officials at the federal, state, and local levels, including Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, state Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson, and U.S. Senator Alex Padilla. These leaders, who represent the interests of the people, have voiced serious concerns about the potential harms of this project, and their opposition should be taken seriously.

4. Economic and Environmental Harm

This project is likely to have significant economic consequences, including the depreciation of property values in the surrounding area. Homeowners and business owners in our community will suffer financially as a result of the increase in traffic, crime, and noise that would accompany the casino. Additionally, the environmental impact of the proposed project could be catastrophic, as it threatens local wildlife, natural resources, and the surrounding ecosystem.

Conclusion

I urge you to consider the long-term consequences of this project on our community, our environment, and the local Indigenous peoples whose rights are being overlooked. The voices of those who will be most affected by the Koi Nation casino project must be heard, and I strongly oppose this development. I respectfully request that you deny approval for the project and protect the interests of the local community.

Thank you for your time and consideration.

Sincerely,

Nancy Jimenez

From: Grace Ocampo <gbabysweetness91@icloud.com>
Sent: Sunday, December 22, 2024 11:43 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Opposing Koi Nation Project in Windsor

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I, Grace Ocampo am a Lytton Rancheria Tribal Member and Windsor Resident. I feel it's unfair and biased towards our tribal community that the Koi Nation are even taking into consideration in building a Casino in our community. When Lytton Rancheria was told by Windsor City Council that we were not allowed to build a casino and had to sign a contract stating so. That being said I really hope this email brings clarity to this detrimental situation.

From: dfamily1971 <dfamily1971@gmail.com>
Sent: Sunday, December 22, 2024 11:56 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Opposed Koi nation Windsor casino project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

I, Dennis Ocampo, member of Lytton Rancheria Tribal member of Pomo Indians.

I would like to bring to your attention sir, the Koi nation, are not from this area ,but 50 miles north east, Upper lake. They're from a separate county and trying to claim ancestral rights and build a mega casino in the town of Windsor,

I feel it's unjust as Governor Gavin Newsom, Sonoma County Board Supervisors, the Windsor Town Council, State Senator Mike McGuire, Congress Jared Huffman, Congressman Mike Thompson, and U.S Senator Alex Padilla, all oppose their actions.

Please, take in consideration this letter.

Thank sir,

From: Jacob Enriquez <jake.300553@gmail.com>
Sent: Monday, December 23, 2024 12:08 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi nation Casino

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Mr. Broussard as a member of a federally recognized tribe, my concerns with the koi nation and possibly others to follow. My gripes are as follows below:

Koi nation is trying to build a casino in an area where they have no ancestral claims, they have already attempted to open a casino and were denied in 5 other counties:

Richmond
Oakland
Los banos
Vallejo
Sonoma

They are now attempting to streamline one into Santa Rosa county near the ancestral lands of Gratton and Lytton. They are disregarding Environmental impacts for a profit under no pretense. Why should they be allowed to when Lytton has fought for decades to even be allowed to claim a small fraction of what they are proposing? The citizens of Windsor, Santa Rosa, and all tribal members in the area do not want this tribe from Clear lake in the area. Lytton, Gratton, Cloverdale, Drycreek were all on great terms with the residents of the area before they were allowed to resettle in an area they were born to.

There are also multiple lawsuits against Koi nation that are pending or ongoing, ab52 is the most recent where Koi failed to timely produce findings of resources to the city of clear lake. They aren't having any positive impact on any community they are trying to be a part of and should not be allowed into the beautiful community of Santa Rosa county and of the city of Windsor.

Thank you for reading,
Jacob Enriquez
(559)385-0547

From: markandmerilee@aol.com <markandmerilee@aol.com>
Sent: Monday, December 23, 2024 12:56 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort & Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Please read the attached letter regarding my comments on the Shiloh Casino Resort Project.

Merilee Maystrovich

Merilee Maystrovich
6114 Amie Drive
Windsor CA, 95492

To: Chad Broussard; chad.broussard@bia.gov
Environmental Protection Specialist, Bureau of Indian Affairs

**THIS IS WHY I THINK THE KOI NATION'S SHILOH RESORT & CASINO PROJECT
IS WRONG FOR WINDSOR AND FOR MY FAMILY**

I moved my family to Windsor in 1989 from San Jose. The main reason why was for its small-town feel, agricultural setting and the safe family setting.

I live approximately a half mile from where they plan to build this monstrosity of a casino/hotel which is surrounded by residences, parks, & churches where children will be playing. This is not why any of us moved to this area. We don't want to live and raise families around a casino that will bring in rift raft (smoking, drugs, prostitution, and criminal elements; break-ins to support their lifestyle habits).

THE MOST IMPORTANT THING IS THE SAFTY OF OUR CHILDREN AND GRANDCHILDREN!!

1. WE MUST PROTECT OUR NEIGHBORHODS & NOT DEGRADE OUR QUALITY OF LIFE.

2. THE NOISE AND BRIGHTNESS WILL DISTURB SLEEP. If I can hear the fans from the vineyard from my upstairs bedroom window while I am sleeping at night (they only use them when needed), I can only imagine what it will be like hearing this daily, the cars, motorcycles & trucks coming and going 24/7 honking horns, revving their engines and listening to delivery trucks backing up with their "beep, beep, beep", I'm never going to get another good night's sleep.

3. MASSIVE TRAFFIC AND AIR QUALITY After having to evacuate twice because of fires, I can't imagine trying to get out through our single lane roads. Those coming down from the mountains won't have a chance. The fire can spread faster than anyone can get out now and we DON'T want four lane roads, we want to keep our tree lined roads and our small-town feel.

The construction that will be happening for years will worsen the air quality. My husband has asthma and other beathing issues and this will only make matters worse for him and others like him. Then once the casino is done, we have another problem with air quality from all the cars, motorcycles & trucks coming and going 24/7.

We currently have wonderful air quality, thankfully since we live outside the city, and that's the way we want to keep it.

4. GROUND WATER We've had to ration water for years. At times we have had barely enough to go around. The run off from the casino into the water supply is a concern and **Windsor doesn't have the capacity to handle THEIR WASTEWATER.** We shouldn't even be building any more homes until we have the wastewater and water infrastructure in place. **This land is Zoned for agriculture and this is how it should stay.**

5. THE KOI NATION IS NOT NATIVE TO OUR AREA, BUT ARE RIGHTFUL LAND OWNERS IN CLEARLAKE/LAKE COUNTY. THAT IS WHERE THEY SHOULD BE BUILDING THEIR CASINO AND HOTEL. NOT HERE!

It's not right that they had someone from out of state come into California and purchases this piece of land and then claim it when it really isn't theirs from the start. Not only this, the native Indians in this area DO NOT WANT THIS CASINO EITHER!

Sincerely,

Merilee Maystrovich
markandmerilee@aol.com; mmaystrovich@icloud.com

From: Michael Racho <mgracho4351926@gmail.com>
Sent: Monday, December 23, 2024 1:11 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Pushing To Open A Casino

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Allowing the Koi Nation to build a casino out of the tribe's aboriginal land base is wrong...
If you feel this is okay...then allow Dry Creek Band of Pomo Indians to build a casino on their property in Marin County. You need to be fair to ALL tribes.

From: avianna dickerson <avianna.ad21@gmail.com>
Sent: Monday, December 23, 2024 7:39 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, 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 Broussard,

I am writing to express my strong opposition to the proposed Koi Nation casino project in Windsor, California. As a member of the Lytton Rancheria, I am deeply concerned about the negative impact this project will have on our ancestral lands, our community, and the town of Windsor as a whole. This proposal disregards the voices of Indigenous peoples who are native to this region. It is disheartening to see a tribe from an entirely different county attempting to establish a casino on land that holds significant historical and cultural importance to our community. Such a project undermines the progress we have made in establishing a secure homeland in Windsor and jeopardizes the physical, economic, and cultural foundation we have worked so hard to build. In addition, this project raises serious concerns about its broader effects on the Windsor community. Increased traffic, noise, and crime are likely outcomes that will strain local resources and disrupt the quality of life for residents. Furthermore, the project risks depreciating property values and causing long-term environmental harm. These issues have already led to widespread opposition from federal, state, and local elected officials, including Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, State Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson, and U.S. Senator Alex Padilla. Given these significant concerns, I urge you to reconsider allowing this project to proceed. Thank you for your time and attention to this critical matter.

Best regards,
Avianna Dickerson
Lytton Rancheria Tribal Member
Avianna.ad21@gmail.com

From: mbrooklaw@gmail.com <mbrooklaw@gmail.com>
Sent: Monday, December 23, 2024 7:47 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Comments on FEIS, 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:

Attached please find our comments on the FEIS relating to the Koi Nation Shiloh Resort and Casino Project being considered for our neighborhood.

If you have any questions, please do not hesitate to contact us.

Yours,

Sue and Michael Brook
6157 Wright Way
Windsor, CA 95492
707 889-7189

**Brook Family
6157 Wright Way
Windsor, CA 95492**

December 23, 2024,

Attr:

Chad Broussard,
Environmental Protection Specialist,
Bureau of Indian Affairs, Pacific Region,
chad.broussard@bia.gov

RE: Comment on the Final Environmental Impact Statement ("FEIS")
Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard:

We live on Wright Way, Windsor, within 2,000 feet of the proposed casino site.

We oppose the propose developments, and suggest that Alternative D, No Action Alternative, EA 2-24, makes the most sense and involves the least harm.

The proposed site is unsuitable for a casino/hotel for many reasons. Many of these reasons, and deficiencies in the FEIS, are very well addressed and explained in the letter submitted by the Town of Windsor, dated December 20, 2024.

As local residents, we write to join in the comments of others and to highlight a few issues that are inadequately addressed in the FEIS include:

1. Already Diminishing Property Values and Preventing sale. The proposed Project is across the street from a residential area, Oak Park, and close to our Oak Creek neighborhood. The proposed Project is already having a devastating impact on house values and sales.
 - As disclosed by a real estate professional at the Town of Windsor Town Hall meeting on August 14, 2024, even the possibility of a casino across the street is having an adverse effect on property values and sales.
 - Another realtor told us that she withdrew a property in Oak Park from the market after more than six months due to lack of interest, directly attributable to the threatened casino.
 - Another agent, who volunteered to authorize the release of her name (Ms. Ann Amtower), told us that a property on Oak Park had two offers over \$1.3 million, both of which backed out after due diligence focused on the proposed casino.

Other potential buyers dropped out for similar reasons and the property eventually sold for over \$3000,000.00 below the initial offers: about a 23% drop in price.

- Similarly, recently a property in Oak Creek received one offer, which fell through after the potential buyer learned of the proposed casino.

The FEIS utterly ignores this already existing impact on the community.

2. The FEIS Improperly Minimizes the Impact of the Public Park Across the Street.
As we previously pointed out, the proposed Project is across the street from a public park, Esposti Park. Esposti Park is where the initial levels of Little League baseball and softball occur. It is also where other adult leagues play. It is also where the neighborhood walks dogs, has birthday parties/quinceaneras, etc. There is insufficient parking as it is for the current usage, let alone the pressure from overflow parking from the proposed casino. Commonsense dictates that being across the street from this public park (and residential neighborhoods) is altogether not the right environment for a casino.
3. The wildfire concern is multi-faceted, and REAL.

This area of Windsor, the one adjacent to the site, has been evacuated three times since 2017: the 2017 Tubbs Fire (voluntarily), the 2019 Kincade Fire and the 2020 LNU Fires (both mandatory). These fires have devastated the communities. Windsor was thought to be a total loss in 2019, according to the Fire Marshal, but for a subsequent shift in the wind and heroic efforts by the firefighters.

The site (as is) is in a high wildfire risk area. The average risk to housing in Windsor from wildfires is 73% above the national average, per the USDA National Fire Service website – and higher on the edge of the community where the casino is proposed.

The grape fields, including as currently at the site, help protect the Town. (Significantly, the main intrusion of fire into housing in Windsor in 2019 came where there are no grape vines protecting it, in the northeast corner, as the fire came through Foothill Regional Park.) In 2017, fire embers flew from Shiloh Ridge (more than 0.3 miles away) over the grapes and impacted houses on the perimeters of our neighborhood, Oak Creek (which is just north of Oak Park, the neighborhood across the street from the Project site.). Our house is nearer Old Redwood Highway and we had a burn mark on our roof.

In 2017, in the Tubbs Fire which impacted Mark West and Santa Rosa just to the south, burning projectiles flew across the freeway, Highway 101, burning a department store from the inside out, as the burning projectiles pierced doors and windows, and then spread the fire and devastated the residential neighborhood of Coffey Park. Fire impacted the Shiloh Ridge, immediately to the east of the site, in 2017 and 2019.

The proposed Project would remove the protection from the grape fields. Instead, the proposed Project would create a wildfire refueling station and heat island at this location, threatening the Windsor neighborhoods and the housing and mobile home park across Old Redwood Highway to the south and west.

Evacuation: Even the FEIS acknowledges that the presence of a casino/hotel will increase evacuation times significantly. Clearly, this is unacceptable.

Moreover, in addition to the deficiencies in the traffic study in the FEIS, it does not consider the impact of (1) evacuees being in unfamiliar surroundings, and (2) alcohol on the thousands of people evacuating from the Project in the stress of an evacuation because of impending fire. Obviously, this is not a negligible factor and one which should have been addressed.

Shiloh is a major evacuation route for this part of Windsor. Windsor's population is about 26,000 or so – the extra stress of a third as many people (many of whom will have been drinking) again on the evacuation routes is easily imagined. The FEIS does not take into account the significant development on the corridor between the planned Casino and Highway 101: there is already a 132 three-bedroom unit apartment building about to open on the corner of Old Redwood Highway and Shiloh and another significant apartment building in construction closer to Highway 101. These are not addressed in the FEIS.

Conclusion: Fundamental policy reasons against the Koi Nation establishing a casino/hotel so far from their ancestral lands are addressed by the other local tribes, such as the Federated Indians of Graton Rancheria, including in their recently filed lawsuit in Federal Court, and the Lytton Rancheria Tribe of California, the August 16, 2024 letter from the Governor's Office to Assistant Secretary Bryan Newland, statements by the academic experts, such as Professor Peter Nelson of UC Berkeley, at the virtual public hearing on July 30, 2024, and the Editorial, Press Democrat, August 25, 2024, "Windsor is wrong spot for Koi casino."

But even the Koi Nation's own logic allows that the casino/hotel does not have to be built here, but could be placed anywhere where the Koi Nation historically went. (There is no dispute that this part of Sonoma County is not the tribe's home, which is more than 50 miles away.) The site and the factors that render it unsuitable for a casino/hotel existed before the Koi Nation chose to purchase the site in 2021. The Koi Nation may find a site for a casino/hotel project that does not have the multiple issues associated with it that this one does, but for this site the only reasonable result is Alternative D - No Action Alternative.

Respectfully yours,


V. Sue and Michael Brook

From: MARK HELLENDER <m.hellender@comcast.net>
Sent: Monday, December 23, 2024 10:45 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Proposed casino in Windsor, CA

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I want to add my voice to the many who have expressed opposition to the proposed Windsor casino. I live at the north end of Santa Rosa, just a few miles south of the proposed site. Others have laid out the many reasons why this casino is a bad idea and should be denied. I agree with those reasons. There are already two casinos in Sonoma County. **We definitely do not need a third.** I'm sure there is big money behind this. Please listen instead to the voice of the local residents and many elected officials who do not want a new casino in Windsor.

Sincerely / Mark Hellender

From: Sharon Morgan <shmorg50@gmail.com>
Sent: Monday, December 23, 2024 11:05 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation casino project

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Dear Mr Broussard,

As a long time resident of Sonoma County, I have seen continued encroachment on agricultural lands.

This project has few positives outweighing the negatives. The Koi Nation is proposing a development far out of their aboriginal lands.

Our area is already grappling with pressures for more housing, creating more traffic and environmental compromise.

I live south of Windsor, but the impacts will be felt all along the US 101 corridor.

Proximity to a residential area, and importantly, effects on the ability of residents to evacuate in an inevitable repeat fire or other disaster are other compelling reasons to vote against this project.

As I live near the Graton Casino, my neighbors and I have noticed increase in traffic noise, light pollution and crime.

However I do recognize that the Graton tribe contributes to our community, and provides a source of wealth to the tribe.

With the Koi Nation project , the revenue will be going elsewhere.

Please consider ruling against the Koi Nation project.

Respectfully,

Sharon Morgan
Cotati, CA

From: Eleanor Salanueva Billy <Salabill18@gmx.com>
Sent: Monday, December 23, 2024 11:47 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation

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Eleanor S

12/22/2024

To Chad Broussard,

My name is Eleanor Salanueva Billy, and I am a member of the Lytton Rancheria Band of Pomo Indians.

I am writing this in regards to the proposed Koi Nation Casino in Windsor, CA.

Most of my life, my chairwoman was Margie Mejia. She worked endlessly for our tribe. She acquired land, and self sufficiency for our members. Her sacrifices, love and hard work will never be forgotten.

With all she did, Margie, and our tribe, faced much opposition. Still, she strived to better the lives of her family.

Andy, Margie's son, has taken on the task of chairman, and will continue to fight for opportunities for his family.

I think every tribe should be able to have the opportunities that our tribe has had.

But, let them take the correct steps. Let them do it in their actual native environment. Let them receive these opportunities without being deceitful towards people whose lives they will impose on in majorly harmful ways.

Along with my tribe, there are other tribes native to this area who have had bitter fights with non natives in the area and local governments just to build houses, or economical developments to support the native people from here.

Yet, Koi Nation, not a local tribe, plans to come and build something no one really wants here. Something any other local tribe would be targeted negatively for.

I don't understand how Margie could have worked so hard and fought so long just to have homes built for her people, but a tribe not native to this land can come in build a casino that would negatively affect the lives of not just the local tribes, but all people in this area.

Please, don't let this happen. Let the Koi Nation build whatever they like in their area. Let our local tribes prosper in our area.

Thank you for your time,



Eleanor Salanueva Billy

From: Joe Finigan (Omni Alien) <omni707@gmail.com>
Sent: Monday, December 23, 2024 12:02 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation casino proposal

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Dear Mr. Broussard, I am writing this letter to you because of the proposed Koi Nation casino project. This proposal would allow the Koi tribe to build a casino in an area that is not their homeland, creating a detrimental standard for others wanting to do the same. This would be a slap in the face to local tribes denied the same rights on their own land.

The local tribes and communities would also have to deal with an increase in crime and a depreciation in their properties' value. The Lytton Rancheria was just able to establish and build their own reservation which would be negatively impacted by the effects of this proposal. The environmental damage would also be great, and have an effect on the way the local communities deal with emergency fire situations, which we know are unfortunately common in California. I am not the only one that feels this way.

Many elected officials such as Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, State Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson and U.S. Senator Alex Padilla are also against the approval of the Koi Nation casino.

I plead with you to give a greater consideration to what has been said and to listen the people of the local community who opposes this casino. Thank you for your time and consideration.

Joseph Finigan

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error-free. The sender therefore does not accept liability for any errors or omissions in the contents of this message that arise as a result of e-mail transmission. Thank you.***
Sent from my iPhone

From: 707augie <agustinsalanueva@gmail.com>
Sent: Monday, December 23, 2024 12:06 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Project

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Agustin Salnueva Dominguez

12/22/2024

To Chad Broussard,

My name is Agustin Salanueva.

I am a resident of Windsor, CA, near the proposed Koi Nation Casino.

My family and I are opposed to the Koi Nation's project. As are the Windsor Town council, Gov. Gavin Newsom, Local County Board of Supervisors and the majority of local people.

The Koi Nation's Casino will cause an increase in traffic to a small, already congested area.

In this little community, I am afraid that we will also see an increase in crime.

Please, do not allow this project to happen. Please, think about the lives of the local people and our wishes.

Thank you for your time,

Agustin Salanueva

From: KEVIN WARREN <cajunce@comcast.net>
Sent: Monday, December 23, 2024 12:19 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, 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 strongly oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project. You have promised to consider public comments, but it is evident in the FEIS that you have not.

I have written before and the FEIS is flawed. There are many items in the FEIS that are passed over that are harmful to the community. Lots of empty words but no real solutions. The constant use of "best management practices" without any enforceable guarantees is not a plan to alleviate the problems this casino will cause. The rating of problems like crime, noise, drunken driving, environmental damage and wildfire evacuation with a LS (Less than significant) are just wrong. This project seems to be rushed through without proper respect and careful evaluation of what the community has to say from our California Senators to our Governor to all local elected officials to neighbors across the street and the community at large.

Another major flaw in the FEIS is the impact on property values. Using a radius 5 miles does not reflect the actual impact to hundreds of nearby neighbors and only dilutes the overall damage with thousands of homes to make this seem like a minor issue. Using a 1/2 mile radius and a separate report of the neighborhood across the street would show the true horrible effect on property values.

Please reject this unfair and flawed FEIS and the Casino in a neighborhood plan.

Kevin Warren
6181 Lockwood Dr
Windsor, CA

From: Ray Farias <ray.rey07@gmail.com>
Sent: Monday, December 23, 2024 12:21 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation- Attention: Chad Broussard- Environmental Protection Specialist

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello Mr.Broussard-

Happy Holidays. The reason for this email is plain and simple. I am a resident of Windsor, Ca and I was born and raised in Sonoma County. I would like you to know that I strongly oppose the Koi Nation fee-to-trust, (Shiloh Rd) application being approved.

As you know if approved, 68 acres of land will be developed into a “ \$600 million Las Vegas-style Casino resort.” The last thing Sonoma County needs is another busy casino taking over and congesting our beautiful backroads. There are already 2 casinos within 20 miles of Windsor. I can not think of one valid reason for approving this application and having this project move forward.

The traffic and crime would increase significantly if their application were to be approved. What will become of the beloved Esposti Park located across the street? Saturday baseball games at Esposti would never be the same again.

The Koi tribe has been trying to find a new “home” for their casino project for a while now. After being turned down by other cities, they turned their focus to Sonoma County. It is quite obvious they do not care where they have a casino, just as long as they have one. Our own Governor Gavin Newsom has urged the rejection of their efforts.

I surely do not expect the Koi tribe to care or fully understand the negative impact their casino would have on our community. After all, why would they? To the Koi tribe, it is just a plot of land that they spent millions on just so they could make millions more. They are not from our area. They have zero connection physically, emotionally or spiritually to our beautiful county.

It is not right that this tribe can just appear to blindly put their finger anywhere on the map of California and say, HERE is where we will set up shop and disturb an otherwise peaceful, family community. The toll that their proposed casino would take on our resources would also be terrible for our town/community.

Mr. Broussard, please consider my concerns as well as the community’s concerns. This proposed project is definitely not a good fit for our community.

Thank you.

Ray Farias

Windsor, Ca

From: Sam Campos <acampos1221@gmail.com>
Sent: Monday, December 23, 2024 12:28 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Opposition to Proposed Koi Nation Casino in Windsor

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Good afternoon Chad,

I write to you this Christmas week in order to oppose the proposed Koi Nation Casino in Windsor.

Windsor is seemingly becoming a hot spot for tribal operations and I worry about the snowballing effect if this casino is built. I have spoken to many of the local citizens and our concerns are widespread and shared. Windsor is known as a charming town on the outskirts of Sonoma and Napa, that is held in high regard for its luxurious local commerce, affluence, and safety. A casino would promptly change that reputation and increase traffic, noise and crime.

From our community discussions, I was appalled to hear that this tribe is in fact not local to the area and is simply trying to capitalize on the city's virtues listed above.

I do not wish to be perceived as ignorant of the Native American plight, however I do not believe diminishing the livelihood of the local population is the way to go.

If nothing else, I trust the true local tribes would be asked for their input.

Respectfully,
Samuel Campos

From: Judy Lunde <fjlunde1231@comcast.net>
Sent: Monday, December 23, 2024 12:43 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi project, Windsor CA

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Mister Broussard,

As a resident of the community of Larkfield, Sonoma County, CA, I believe that the proposed Koi Casino project under consideration for the Town of Windsor does not need to be realized here, it's simply the wrong place:

Too close to residential and popular recreational areas, Too much traffic to be supported on the small ancillary roads that lead to the project. Not to mention the drain on our limited resources affected by the project (water supplies, sewer, police and emergency services).

I generally believe that our indigenous peoples deserve their independence and financial security but enough is enough! Sonoma County does not need another casino in Windsor to dilute the earnings of the other established tribes in our area. Please consider granting the Koi tribe their reservation in their ancestral home, Lake County.

Respectfully, Gordon and Frances Lunde
fjlunde1231@comcast.net

From: Angelina Smith <angiesmith1993@gmail.com>
Sent: Monday, December 23, 2024 2:20 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation

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Hello Chad,

My name is Angelina Smith. I'm reaching out to you in opposition of Koi Nation Casino. I grew up in Sonoma County, and what a privilege it was. We appreciate our beautiful wine country, the natural splendor that exists here. To build this casino is to take away from that, to cause significant environmental harm. I would like to add that this land is not Koi Nation's ancestral lands so it feels that they have little regard for the impacts.

I have talked to my community, all conversations have been in opposition of Koi Nation Casino. The town of Windsor has been a safe haven for people and their families. We choose to live here because it's a safe, peaceful small town. Going ahead with this casino would without a doubt change that, it does everywhere there is one built. Crime increases as well as traffic always.

Koi Nation Tribe has not gone about this in the right way whatsoever. They have attempted to build all over California, other than where they are originally from. By allowing this casino to be built it opens up the floodgates for gambling on every corner, no matter if it was a tribe's ancestral lands or not. The people of California do not want to become the next Las Vegas.

The fact that so many other tribe's are against this says a lot. These tribe's want the best for one another. It's apparent that Koi Nation has little care or concern for their native brothers and sisters. Thank you for your time in reading my message, and I hope you have a warm and wonderful holiday.

Warmly,
Angelina Smith

From: Catherine Collins <catherinec@sffriendshiphouse.org>
Sent: Monday, December 23, 2024 2:59 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Tribal Letter from Ruby Steele

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Please see attached letter from Ruby Steele.
Catherine Collins
Certified SUD Counselor / CADDC 1
Mohawk / Odawa
Friendship House Association of American Indians
56 Julian Avenue
San Francisco CA, 94103

415-865-0964

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To whom it may concern,

As a resident of Windsor and a member of the Lytton Rancheria Tribe, whose ancestral homeland will be directly affected by the proposed KOI Nation casino project, I am writing to express my strong opposition to this development.

This project poses significant environmental risks, and it will lead to increased traffic, noise, and crime in our community. Additionally, it will likely decrease property values, further harming local residents.

As someone whose ancestral lands will be impacted, I am deeply troubled by the apparent disregard for the voices of the indigenous peoples native to the proposed site. It is insulting and frustrating to see a tribe from another county attempt to push forward a project on our land.

This project is opposed not only by myself, but by a broad coalition of elected officials, including Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, State Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson, and U.S. Senator Alex Padilla. Additionally, surrounding federally recognized tribes have also voiced their concerns.

The widespread opposition to this project underscores its potential harm to our community, environment, and cultural heritage.

Thank you

Ruby Steele

From: sam salmon <mayorsalmon@gmail.com>
Sent: Monday, December 23, 2024 3:01 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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December 23, 2024

Dear Mr. Broussard, Amy Dutschlze and the Bureau of Indian Affairs. My name is Sam Salmon and I been an elected Windsor Council Member since 1994, 30 years. I have reviewed the Town of Windsor's comments to the Final Environmental Review (FEIS) and agree with the Town's analysis and objections to many of the FEIS findings. While the proposed project is not within but adjacent to the Town on two sides, both Old Redwood Hwy and Shiloh Road, the Town of Windsor will be the jurisdiction far and away most impacted by the project in any of the alternatives except "No Project".

The Town's comments addressed specific flaws in the analysis that led to determinations in the FEIS that the impacts of the project could be resolved to the point of being less that significant. Many of the flaws in the analysis were blatant like using modeling that is not accepted in the field of environmental review. There is an across the board use in the FEIS of the terms of mitigation being the use of Best Management Practices (BMP's) without identifying them or describing how they would provide mitigation.

My Town, Windsor, is experiencing traffic congestion at our two main Highway 101 intersections, Central Windsor and Shiloh Road. The traffic mitigations suggested by the FEIS for the Shiloh Road corridor to be used by the Project will not be able to handle the impacts of the Project, not even close with the specific mitigations put forth in the FEIS. The Town's comments and objections clearly cite the inaccuracies and failure to use appropriate analysis in coming to the FEIS conclusions.

The FEIS analysis of fresh water use by the Project and the Project's methods of dealing with their wastewater was specifically called out in the Town's comments. I current sit on the Sonoma County Santa Rosa Plain Ground Water Sustainability Commission (SRGSA) which is charged by State Law enacted in 2017 to monitor and protect ground water resources which include the Project site. The analysis and mitigations suggested by the FEIS do not meet the standards and requirements of the SRGSA. This week Sonoma County reinstated a moratorium on any drilling new wells in the County except for emergencies until the County could provide the necessary analysis of the impacts on ground water extraction on surface water resources such as streams within the areas watershed. This issue of effect on the creek running through the Project was specifically raised the the Town's comments as well as the lack of any real analysis of the projects impact on adjacent wells in the projects immediate vicinity.

I also sit on the Russian River Watershed Association and the Sonoma County Water Advisory

Committee, both charged with protecting the watershed in which the project sits from any further degradation from current and future human activity and development. The FEIS failed miserably in describing the Project's impacts from wastewater discharge as well as any necessary treatment of the projects generated sewage. The Town has described the flaws in the analysis and proposed mitigations to the point that they really cannot be overlooked.

The Town's objections to the analysis and conclusions stated in the FEIS are real and serious. The site selected by the Koi's is not just unsuitable for the Resort Casino Project, it is incompatible with the projects environmental setting and the Town's surrounding residential, recreational and commercial existing uses.

Please consider the Town's comments and objections and deny the Shiloh Resort and Casino project from becoming sovereign land of the Koi Tribe as inappropriate and incompatible as located.

Respectfully submitted;

Sam Salmon, Windsor Town Council Member
956 Milsom Place
Windsor, Ca. 95492

Sent from my iPad

From: sage boek <sageboek@yahoo.com>
Sent: Monday, December 23, 2024 3:14 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Environmental impacts of Koi casino

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Dear Chad Broussard,

I hope this email finds you well. I am a Fishery Biology student and environmental activist and wanted to share some information with you that may have an impact on my communities environment.

Salmon and steelhead are vital species for both ecological balance and human economies, particularly in regions where their habitats are integral to the environment and local culture. These anadromous fish depend on pristine waterways for migration, spawning, and rearing. However, increasing pollution in rivers, streams, and estuaries threatens their survival. From industrial runoff to agricultural waste, pollutants wreak havoc on these delicate ecosystems, leading to consequences for the species and their environments.

The proposed casino building sight is directly on a Pruitt creek which flows in to Winsdor creek, markwest creek, and eventually in to the Russian river. Markwest creek is a life line for some of the last native and truly wild salmonid species with in the entire Russian river valley. Having this kind of industrial building directly on a waterway would send toxins, and heavy metals to not just the water the fish use but also the water that local communities drink. The Russian river has had countless environmental impacts revolving around fish populations over the last 70 years, we need to avoid repeating the same mistakes we have made time and time again. Thank you for your time and I'm looking forward to hearing from you.

Best,
Thomas Boek

From: Bay Area Loco <marcusyb92@gmail.com>
Sent: Monday, December 23, 2024 3:25 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS comments, Shiloh resort and casino

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Dear Chad Broussard,

I write to you today with many concerns regarding the proposed Koi Nation casino and how it will affect the County, Town of Windsor, surrounding communities and the local Tribes of Sonoma county. I also have concerns of the harm it will cause to the environment and natural habitat.

Growing up in north Santa Rosa, and Windsor I have befriended many local Native Americans whose ancestors are rooted to the region of Sonoma county. I have learned much about their ancestral lands and traditions and how much their ancestral land means to them. It concerns me that the Koi Nation tribe would be able to put a casino on land that is so far from where their actual roots are, which is in Lake county. The proposed casino site is disrespectful to the local tribes who have fought and continue to fight for their ancestral land as many of the local tribes oppose this project and seem to have their concerns overlooked.

Having lived in the Windsor and Larkfield area, I have seen the traffic already and much more traffic there will be with the new housing communities let alone a large casino and resort. There are elementary and high schools in close proximity to the proposed site. Congestion in the area, specifically Old Redwood Hwy, is already bad for school drop-off and pick-up. A casino open 24 hours would only bring more congestion to the roads. A casino next to schools, also leads to concern, as crime in the area may rise. Also, with many small roads to rural properties in the area, there aren't many exit routes in case of emergency. Fought road for example can not handle loads of traffic that the casino would be adding. This small area and intersection of Shiloh and Old redwood hwy is already very congested with traffic at times, to add hundreds of more cars on a daily basis just doesn't seem to make much sense to locals. The proposed casino also brings concerns of environmental harm and air pollution. The quality of air would decrease with smog from the parking lot of hundreds of cars. There are several apartment complexes that face Shiloh road and Old Redwood hwy directly across the street from the proposed project. Also, concerns of light pollution and noise to the neighborhood right across the street.

Windsor residents, Larkfield residents, Local tribes, Sonoma County elected officials, Sonoma county board of supervisors and the Governor of California oppose the Koi Nation Casino. Please hear our concerns.

Thank you,
Marcus Youngblood

From: Mary Euphrat <euphrat@sonic.net>
Sent: Monday, December 23, 2024 3:42 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort & Casino Project

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To: chad.broussard@bia.gov
From: Mary Euphrat, euphrat@sonic.net; 6203 Lockwood Drive, Windsor, CA 95492
RE: Comments on the Final Environmental Impact Statement published on November 21, 2024 for the proposed Koi Nation Shiloh Resort & Casino site on Shiloh Road and Old Redwood Highway
Dear Administrator:
This letter is in response to the Final Environmental Impact Statement published on November 21, 2024 concerning the proposed Casino and development on the southeast corner of Old Redwood Highway and E. Shiloh Road.
This morning before I began to write this letter, I woke up to two owls hooting to each other. These are owls that frequent our neighborhood which is adjacent to Esposti Park, just north of the proposed project on Old Redwood Highway. My immediate thought was, what will happen to these owls when the Casino is developed? Will they be disrupted from the lights, noise, and traffic that will be an affect from the development? Will the owl tower that my husband built for them as a home be empty because of the development? Will they move from our quiet neighborhood with no street lights to somewhere where they feel protected? Our neighborhood and the neighborhoods adjacent to the proposed Casino are just that, neighborhoods. It is not a commercial area. We frequently see wildlife in our neighborhood besides the owls, foxes, mountain lions, deer, racoons, and more. Disrupting the current property which is a vineyard with a creek will definitely cause a disruption to the wildlife cycle, something I would think Native Americans would consider with their heritage and traditions. A Casino makes money and its blueprint on the land will forever change the environment around it. There is no tradition or heritage associated with it, just greed for money. Even residential homes would have less of an impact in the agricultural area where the Casino is proposed.
The Koi Tribe from Lake County (not Sonoma County) has purchased vineyard acreage adjacent to a series of single- family homes, parks, schools, a church, and other nearby residential neighborhoods. The proposal of a large casino complex including restaurants and a hotel will have a negative impact on our local environment adding traffic congestion, infrastructure strain, lack of emergency access especially during fires, disturbance of wildlife habitat, lack of water supply especially during drought conditions and much more. The Koi have never resided in Sonoma County and should not have precedence over local tribes.
TJKM prepared a traffic impact statement on the impact of the three proposed alternatives on traffic and circulation. Their statement is based on minimal data and data that was collected on two winter dates and one summer date. Both the Shiloh Regional Park and Esposti Park border the proposed Casino and are very busy with hikers, soccer, baseball, and softball players and bicyclists along with equestrians. The number of cars in those areas during the busy fall, spring, and summer months are not reflected in this report. With the addition of a new apartment complex ready to open within the next few months, parking is very limited in front of Esposti Park. There is no reference to these additional cumulative projects and their impact on traffic conditions or delay or loss of services based on traffic. There is no information on how the mitigation efforts that were mentioned in the traffic study will improve conditions or guarantees that the mitigation would be effective.
Water is always a huge focus. During drought years our community has had to regulate use of water based on hours and days of the week. The casino leaders are proposing setting up their own wells and wastewater systems. This will affect the aquifers in the area and many of the residential homeowners that are on wells adjacent to the property. Their wells could go dry as a result of a well water system placed

on the casino property. The EIS indicates that the onsite wells would be deep wells and that the shallow wells belonging to nearby residents are at most risk. The report discounts the risk, cost and impact of reduced or inadequate water supplies to local residents.

Fire has been a huge issue since 2017. The lack of roadways to support evacuation or residential areas in a timely manner has been a major challenge taking up to 8 hours to evacuate only 15,000 people. The Kincaid Fire came down close to the proposed casino. Imagine trying to evacuate hotel and casino guests along with the residential neighbors before the fire reaches the property. We don't have the infrastructure to support this project including street structure and utilities, and first responder personnel. The Casino patrons would increase the amount of people to evacuate which would increase the risk of loss, injury, or God forbid, death involving a wildland fire. This property is not where a Casino should be built.

Safety is a major concern. There are several elementary and two high schools within a seven mile area of the proposed casino. Human Trafficking, Drugs, and Sex crimes along with other crimes are known to increase near or at casinos, a rate of 6.7% higher than expected based on a study by Thompson, Gazel and Rickman (1996). Do you want to expose our youth to those possible crimes including underage drinking? On the northeast corner of Old Redwood Hwy and Shiloh Road there is Esposti Park. It is a local park for our youth and adult athletes to play teeball, baseball, soccer, and for families to host family parties. Many bicycle enthusiasts park their cars in the adjacent parking lot as a start off point for their bike rides which usually last a full day as they tour the beautiful backroads. I am concerned for the safety of our town's children with a park so close to the adjacent proposed casino. This is a residential area. Not a commercial area.

Lastly, the stress that a casino brings to the mental wellness of people that are living in a quiet neighborhood must be considered. Mental health is very important and although not "environmental" in nature it is a condition that risks the well-being of an individual. This area is quiet, residential, with parks and trails and bike trails, soccer and baseball fields directly adjacent to a casino that will exude the opposite, a transient population seeking the solace of gambling, drinking, and entertainment.

For these environmental reasons I strongly oppose the development of the proposed casino. If the casino was directly adjacent to Highway 101 it would be in a more appropriate development area. The current property is again in a quiet, residential, non-commercial area and not environmentally sustainable. Thank you for your time and consideration.

Sincerely,

Mary Euphrat, 6203 Lockwood Drive, Windsor, CA 95492; euphrat@sonic.net

--

Mary Euphrat

From: Robert Janes <rtjanes@comcast.net>
Sent: Monday, December 23, 2024 3:45 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs

My wife and I reside in the Oak Park subdivision directly across E. Shiloh Road from the proposed resort/casino. The thought of having a gambling casino/large hotel immediately outside our residential neighborhood is heartbreaking. It's our understanding that of all the casinos/hotels constructed in California, not one of is located approximately 100 feet from a residential subdivision, as with this proposal. We strongly oppose the Koi Nation's proposed fee-to-trust transfer of this land, and oppose alternatives A, B, and C.

The Final Environmental Impact Statement (FEIS) released last month, just like the DEIS and EA issued before it, appears to be intentionally complex, confusing and vague. All three reports fail to properly address the significant impacts this project would have on our local area. One must ask themselves - "is the BIA listening to the concerns of the community"??

Although the proposed project introduces myriad far-reaching impacts on the surrounding community and Sonoma County in general, we are going to focus our comments on water supply, traffic congestion and, most importantly, wildfire evacuation.

WATER SUPPLY - There are a number of private homes and vineyards surrounding the proposed site that rely 100% on groundwater. It is estimated that alternative A would consume 350,000 - 400,000 gallons of ground water PER DAY. In time, this massive water usage could easily draw down the amount of water available to surrounding homes and vineyards. The FEIS states this issue is "less than significant" and that the use of "best management practices" would minimize impact to groundwater supply. "No mitigation required", it says. This is very vague.

TRAFFIC CONGESTION - The East Shiloh Road corridor is undergoing rapid development with several projects underway at this time. These include: 1) a large apartment complex at the corner of Old Redwood Highway and E. Shiloh Road nearing completion, 2) a new single family home subdivision one-third mile north of Old Redwood Highway and E. Shiloh Road, 3) a large live-work development at the corner of E. Shiloh Road and Hembree Lane, and 4) an approved huge Senior Citizen Complex directly across E. Shiloh Road at the intersection of US Highway 101. Our purpose here is to point out that the traffic on two-lane E. Shiloh Road will soon be terribly congested...it's already congested. And all this is BEFORE the potential construction of the casino. The FEIS notes that the impact of the casino and construction will be "significant" and "less than significant". Several mitigation measures are noted and every one of them is nearly insignificant and will have little impact on lessening traffic congestion in the area. Examples include:

- add an exclusive left turn lane
- restripe lanes and extend storage length
- optimize splits and cycle length
- signalize intersection
- add additionally right-of-way, if needed

These are cute little sound bites, just minor adjustments, that might work for a small strip mall, but would do nothing to alleviate traffic from a resort/casino project expected to bring in 11,000+ cars per day. Needless to say, the FEIS analysis is woefully inadequate and the mitigation measures totally ineffective for this scale of project.

FIRE SAFETY AND EVACUATION - This is our most significant concern because it could be a matter of life or death. In particular, the FEIS fails to adequately address the fire safety issues of a project of this magnitude (alternative A, B, or C). Recent history tells us that the E. Shiloh Road corridor is THE major artery in the event of fire evacuation. During both the 2017 Tubbs Fire and the 2019 Kincaid Fire, E. Shiloh Road was clogged with cars as residents fled for their lives. A particular pain point was the intersection of E. Shiloh Road and Old Redwood Highway. It's important to note that both fire events occurred BEFORE the four projects listed above began construction. Fast forward to today, we cannot imagine the utter chaos that would ensue on E. Shiloh Road, with the construction of the proposed casino, should another wildfire occur near us. If deaths were to result as residents were unable to flee due to standstill on E. Shiloh Road, post casino construction, I am sure the BIA would be taken to task.

Although the FEIS lists fire safety/evacuation impacts of the various alternative (A, B, or C) as "potentially significant" or "less than significant", we find some of your mitigation measures totally unrelated to safe evacuation along the E. Shiloh Road corridor:

- weed abatement
- remove dead or dying trees over all buildings
- live flammable ground cover shall be removed
- climbing vines shall be maintained
- dead or dying grass shall be removed

Mitigation measures B through D, while addressing getting customers out of the casino, do NOTHING to mitigate the disaster that would be two lane E. Shiloh Road as 11,000+ casino patrons, thousands of surrounding homeowners, apartment dwellers, and elderly senior citizens try to safely evacuate to US Highway 101. Any reasonable person should understand that a safe evacuation, as described, would be impossible. For this reason alone the Shiloh Resort and Casino project should be rejected.

Finally, unanimous opposition to alternative A, B, and C exists at every level - Federal (Congressmen Jared Huffman and Mike Thompson, and US Senator Alex Padilla), down to the State, the County, Town of Windsor, and to individual neighborhoods. While we support indigenous tribes, this project is not suitable for Sonoma County and does nothing to restore lands to the Koi tribe whose ancestral homeland lies more than 50 miles away in Lake County. The only way to prevent the severe environmental, social, and cultural harm this project poses is for the BIA to approve the environmentally preferred "no project" alternative in the FEIS.

Sincerely,

Bob and Pam Janes
5855 Leona Court
Windsor, CA 95492
(707) 838-6954

From: Shar Nordstrom <sharcsr@gmail.com>
Sent: Monday, December 23, 2024 3:47 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard,

I am writing in regards to the Koi Nation Shiloh Resort and Casino Project. I live in the county area between Windsor and Healdsburg. I am extremely concerned with traffic in the area, and also security around the schools in the adjacent areas. This proposed casino also borders Esposti Park, the softball field where children play on their Windsor little league teams on Saturday and Sunday mornings.

A casino on Shiloh Road will impact the areas of Mark West Springs Road, Old Redwood Highway, Faught Road, and Shiloh Road. Shiloh Road is a residential area with 500 homes presently, and with 500 new units being built. The road is narrow, and will cause major traffic problems. In case of a fire, how will everyone get out?

I am a frequent hiker at Shiloh Park and all of the parks in Sonoma County. This area of Sonoma is a beautiful representation of what Sonoma County is all about. Sonoma County already has two casinos, one of which is not doing well. Why put another casino here in beautiful Sonoma County? It would be devastating to this area. Please consider rejecting this project. Please do not make Sonoma County into another Southern California!

Thank you for your time.
Sincerely,

--

Shar Nordstrom Search & Rescue 156

sharcsr@gmail.com

707.292.3168

From: Sandra Peters <sandrapeters7@gmail.com>
Sent: Monday, December 23, 2024 4:27 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Opposition

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello Chad,

My name is Sandra Peters. I'm reaching out to you in opposition of Koi Nation Casino. I grew up in Sonoma County, and what a privilege it was. We appreciate our beautiful wine country, the natural splendor that exists here. To build this casino is to take away from that, to cause significant environmental harm. I would like to add that this land is not Koi Nation's ancestral lands so it feels that they have little regard for the impacts.

I have talked to my community, all conversations have been in opposition of Koi Nation Casino. The town of Windsor has been a safe haven for people and their families. We choose to live here because it's a safe, peaceful small town. Going ahead with this casino would without a doubt change that, it does everywhere there is one built. Crime increases as well as traffic always.

Koi Nation Tribe has not gone about this in the right way whatsoever. They have attempted to build all over California, other than where they are originally from. By allowing this casino to be built it opens up the floodgates for gambling on every corner, no matter if it was a tribe's ancestral lands or not. The people of California do not want to become the next Las Vegas.

The fact that so many other tribe's are against this says a lot. These tribe's want the best for one another. It's apparent that Koi Nation has little care or concern for their native brothers and sisters. Thank you for your time in reading my message, and I hope you have a warm and wonderful holiday.

From: Sandra Alvarez <sandraralvarez09@gmail.com>
Sent: Monday, December 23, 2024 4:28 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Opposition

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello Chad,

My name is Sandra Peters. I'm reaching out to you in opposition of Koi Nation Casino. I grew up in Sonoma County, and what a privilege it was. We appreciate our beautiful wine country, the natural splendor that exists here. To build this casino is to take away from that, to cause significant environmental harm. I would like to add that this land is not Koi Nation's ancestral lands so it feels that they have little regard for the impacts.

I have talked to my community, all conversations have been in opposition of Koi Nation Casino. The town of Windsor has been a safe haven for people and their families. We choose to live here because it's a safe, peaceful small town. Going ahead with this casino would without a doubt change that, it does everywhere there is one built. Crime increases as well as traffic always.

Koi Nation Tribe has not gone about this in the right way whatsoever. They have attempted to build all over California, other than where they are originally from. By allowing this casino to be built it opens up the floodgates for gambling on every corner, no matter if it was a tribe's ancestral lands or not. The people of California do not want to become the next Las Vegas.

The fact that so many other tribe's are against this says a lot. These tribe's want the best for one another. It's apparent that Koi Nation has little care or concern for their native brothers and sisters. Thank you for your time in reading my message, and I hope you have a warm and wonderful holiday.

From: Sandy Alvarez <sandiicious09@gmail.com>
Sent: Monday, December 23, 2024 4:29 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Opposition

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Hello Chad,

My name is Sandra Peters. I'm reaching out to you in opposition of Koi Nation Casino. I grew up in Sonoma County, and what a privilege it was. We appreciate our beautiful wine country, the natural splendor that exists here. To build this casino is to take away from that, to cause significant environmental harm. I would like to add that this land is not Koi Nation's ancestral lands so it feels that they have little regard for the impacts.

I have talked to my community, all conversations have been in opposition of Koi Nation Casino. The town of Windsor has been a safe haven for people and their families. We choose to live here because it's a safe, peaceful small town. Going ahead with this casino would without a doubt change that, it does everywhere there is one built. Crime increases as well as traffic always.

Koi Nation Tribe has not gone about this in the right way whatsoever. They have attempted to build all over California, other than where they are originally from. By allowing this casino to be built it opens up the floodgates for gambling on every corner, no matter if it was a tribe's ancestral lands or not. The people of California do not want to become the next Las Vegas.

The fact that so many other tribe's are against this says a lot. These tribe's want the best for one another. It's apparent that Koi Nation has little care or concern for their native brothers and sisters. Thank you for your time in reading my message, and I hope you have a warm and wonderful holiday.

From: Elizabeth Quiroz <vasquezelizabeth85@gmail.com>
Sent: Monday, December 23, 2024 4:32 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Good evening Chad,

I say no to Shiloh Casino Resort being built bordered next to Windsor.

Please see my letter attached.

Thank you.

Best,
Elizabeth Quiroz, MA
Survivor Leader

To Whom it May Concern,

12/19/24

My name is Elizabeth Quiroz and I have concerns regarding the Shiloh Casino Resort that is being built bordered next to Windsor. I have been in the anti-trafficking movement for about eight years and have learned through testimonials and other organizations that casinos in Sonoma County are a hub for human trafficking. Here in Sonoma County, more than 200 cases of human trafficking have been filed by the District Attorney's office since 2011. According to the American Gaming Association (2022), "The United States is often considered a "destination" country for trafficking, as victims may be lured to the U.S. with false promises of stability, economic opportunity or immigration status. After arrival, victims may find themselves under the control of a trafficker who then uses that control to coerce commercial sex acts for the trafficker's profit. Hospitality venues like casinos are used by traffickers to set up and conduct meetings or seek out potential buyers." The establishment of an additional casino near Windsor, among the two well-known casinos in Sonoma County, would likely lead to an increase in human trafficking cases. Due to a lack of funding, resources such as housing are limited and will be unable to meet the needs of victims if the number increases.

Best,

Elizabeth Quiroz, MA

Survivor Leader

A handwritten signature in cursive script that reads "Elizabeth Quiroz".

From: Katrina Mejia <be2karyn@yahoo.com>
Sent: Tuesday, December 24, 2024 12:54 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Casino

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I am sending this email to share my thoughts on the proposed Koi Nation casino in Windsor. Like very many Windsor residents, especially those with young children and the elderly, my family and I opposed the building of any casino in what is considered a small family-friendly town. Those who are outsiders of Windsor do not understand that this small community is built around growing families as well as retirees. My family and I moved to Windsor seeking a quiet and peaceful lifestyle, away from the noise, traffic, and crime of a busy city. Building a casino in what has been known as a charming town for as long as it's been around would only disrupt the peace and attract outsiders which would change Windsor forever.

As a small community, we ask you to deeply consider our opposition to building a casino and how such casino would deeply impact and sadden our families, especially our children and the elderly.

Sincerely,

Katrina Mejia Ebanks

Sent from my iPhone

From: Linda Moreskine Thomas <Indathomas@aol.com>
Sent: Monday, December 23, 2024 5:04 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard,

I am again going on record that D - No Action Alternative is the only viable conclusion. The Shiloh Rd parcel is the wrong location for the proposed Casino and Hotel project.

I am a disabled senior, previously a Bilingual (Spanish) Consultant in the fields of Disability and Eldercare Management and Special Education Advocacy.

I live a .4 miles away from the Shiloh Rd property on the SouthWest side of Old Redwood Highway, Santa Rosa, CA.

There are numerous errors, outdated forms, inconsistent information, or areas not addressed in this FEIS.

In brief:

- The direct, harmful, and possibly dangerous and life-threatening issues pertaining to the residents who live along Old Redwood Highway from Pleasant Ave north of the E Shiloh Rd parcel down to Airport Blvd have not been addressed, acknowledged, or provided with any Mitigation proposals.

The residents, families, and neighbors here include: Seniors, disabled, veterans, Farmworkers, ranch workers, Spanish-speaking only, and low-income.

There are: Farmworkers apartment complexes, Senior Mobile Home Parks, Board and Care homes for persons with mental illness, and day care for special needs children.

There are more than 10 Senior mobile Home Parks nearby, 3 elementary schools within one mile from the parcel, a long-standing 30 plus years Church across the street from the project on Old Redwood Highway, and a park across the street on E Shiloh Rd.

An Equity determined Latino populace has also been identified in Equity maps.

The accumulative and harmful affects that cannot be mitigated are evident.

I am submitting this email as a Part I listing my concerns.
Part II will be forthcoming with factual documentation.

Please do not approve this project.

Sincerely,
Linda Moreskine
36 year resident of Sonoma County
153 Donna Dr
Windsor, CA 95492

Sent from my iPhone

From: priscilla bale <priscillabale@gmail.com>
Sent: Monday, December 23, 2024 5:08 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Proposed Koi Nation Casino near Windsork C.

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Dar Sir,

My husband and I are writing to you to ask you to oppose the proposed Koi Nation Casino and resort near the town of Windsor, CA. We are residents of Santa Rosa, Ca. - the City just south of Windsor, so we are very familiar with the location of the proposed casino and resort.

All our area's water comes from the Russian River. From the years 2011 to 2017 our area had an extremely serious drought. By the end of 2017, there was just one year of water left for our whole region. The drought has ended, but, thanks to climate change, we do not know when another drought will arrive. Consequently, a huge project like the Koi Casino and Resort could seriously endanger our water supply.

Our area is often prone to wildfires. In 2017, the Tubbs fire burned across or near this area - crossing highway 101 and burning into the Town of Windsor. There is one major highway, Freeway 1010, that provides an evacuation route away from the proposed property. If there is another major fire in the Tubbs fire footprint, residents of Windsor would be hard pressed to evacuate safely. The casino and resort customers would only add to a serious evacuation problem.

The proposed Casino and Resort property is also located far from the Koi Nation's ancestral territory. Their forebears did not make their homes here.

All our local, county, state and federal officials have already opposed this project.

Please do not approve it.

Priscilla and Richard Bale
3011 Santa Anita Court
Santa Rosa, CA 95405

From: Ebony Steele <esteele707@gmail.com>
Sent: Monday, December 23, 2024 5:34 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Kio Nation Casino Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Mr Broussard,

I am writing to address my increasing concerns surround the verdict of allowing Koi Nations Casino Project to move forward to be built in my town of Windsor California. As a resident of I am fully opposed to the opening of the proposed casino near our newly established homeland. The Koi Nation casino project will carry negative impacts for our Town of Windsor and surrounding areas. This project would increase traffic noise and crime in our community, will depreciate our property values, and cause environmental harm. If approved, this mega casino will threaten safe evacuation routes for thousands of residents. The Koi Nation's proposed casino site is situated along a major evacuation route outside Windsor in an area designated as "wildland-urban interface". Human lives are not the only ones at stake. Construction would endanger wildlife habitat, fragmenting wildlife populations and their ecosystems. I am not writing solely as a resident of the area this casino will effect but also as a member of the Lytton Rancheria Tribe of Pomo Indians. As someone whose ancestral home lands will be impacted

I feel there has been a complete disregard for the voices of the Native people indigenous to the proposed site. After casino shopping in 4 previous areas the Koi Nation have been turned down for the same reasons our community doesn't not want the Casino built here. To see a Tribe from another county push a project on our ancestral land is insulting, deeply infuriating, and disrespectful. After the fact that our tribe was prohibited from EVER opening any gaming in the whole Sonoma region feels like a huge slap in the face to my people. We were made to jump through hoops to appease those in power to be able to live on our ancestral lands. This project puts our recently established homeland and everything we fought so hard for at risk, economically and physically.

Even with widespread opposition from federal state and local elected officials, including Governor Gavin Newsom, the Sonoma County board of supervisors, the Windsor town Council state Senate, Mike McGuire, congressman, Jared, Huffman, congressman, Mike Thompson, and US Senator Alex Padilla, and surrounding federally recognized tribes.

Please hear my voice and concerns for this verdict and help me to stop this from moving forward

Thank you,
Ebony Steele

From: catherine dodd <catherine.dodd@gmail.com>
Sent: Monday, December 23, 2024 6:27 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] "FEIS/DEIS Comments, Shiloh Resort and Casino Project" comments

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Chad,
attached please find comments on the "FEIS/DEIS
Resort and Casino Project"
please confirm that this was received.

May we all be well,
With kindness, Catherine

Catherine Dodd PhD, RN [FAAN](#) she/her
[linked](#) in
drcdoddrn.bsky.social
Board Member [Commonweal](#)
Board Member [National Committee to Preserve Social Security & Medicare Join TODAY](#)
Advisor, Families Advocating for Chemical and Toxic Safety [FACTS](#)
[Nurses for America](#) Core Team

Comments on the BIA process. The Shiloh Resort and Casino Project has conducted its evaluation of the casino development—and the process that has **entirely failed to take into account the opposition and concerns and even the effects on and of the surrounding counties and cities**, not to mention tribes in the area that consider the area their aboriginal territory. The zoom hearing earlier this summer was stymied by every member of the carpenters union calling in to support the project – repeating the same information – they did not follow instructions and did not live in the area of concern. It kept people from participating. This was unacceptable. [T]he manner in which Interior is conducting the process suggests that any public input that may occur will serve only to rationalize or justify a decision already made. We expect much more of Interior. Decisions of this nature are of vital interest to Californians, as well as the tribal, county and local governments that may be affected. Cities and counties bear the brunt of reduced tax revenues, they often must make up for drain on public services, and they suffer the consequences of any other detrimental impacts from the project, whether environmental or otherwise.”] The DEIS/FEIS suggest that the KOI headquarters is 12 miles from this site and that KOI live on the site. The headquarters has been there less than a decade and 4 member of the tribe moved into the home on the site earlier this year. This is incredibly misleading!

It's my understanding that: “In adopting IGRA, Congress did not intend that the requirement for a “historical connection to the land” under the restored lands exception be applied in a way that resolved every doubt in favor of the tribe. The Dept of Interior has said so, and we know this also because this conclusion is necessary to the Court’s own decision in this case upholding BIA’s regulations. If this were not true, the Court would have been compelled to overturn BIA’s regulations on this point; since the Court did not do that, we know that it is true. Finding an obsidian chip on the land does not constitute “significant historic ancestral ties” In fact the PBS special makes clear that the KOI ancestors are from an island in Lake County, not the Sonoma Valley. a “tribe must demonstrate a significant historical connection to the land.” The regulations define “significant historical connection” to mean “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.” (25 C.F.R. § 292.2 [emphasis added].)

This final version of the EIS fails to acknowledge the dangerous Public Health impact of gambling addiction on the character of the community. It fails to acknowledge that property values will fall because of noise, crime and traffic. There are two casinos within 30 miles of this site, we do not need to add another.

Comments on new specific Appendices

Appendix E

Air Quality Sec 3.4

“From the text of Sec 3.4: Climate Change On February 19, 2021, Secretary of the Interior Deb Haaland issued Secretarial Order (SO) 3399 to prioritize action on climate change throughout the Department and to restore transparency and integrity in the Department’s decision-making processes.

Climate change has the potential to impact California and the Bay Area natural and economic environment. The following is an abbreviated list of potential climate change impacts. ☐ Rising sea levels along the California coastline, particularly in San Francisco and the Sacramento-San Joaquin River Delta due to ocean expansion. ☐ Extreme heat conditions, such as heat waves and very high temperatures,

which could last longer and become more frequent. ☐ An increase in heat-related human deaths and infectious diseases and a higher risk of respiratory problems caused by deteriorating air quality. ☐ Reduced snow pack and stream flow in the Sierra Nevada mountains, affecting winter recreation and water supplies. ☐ Potential increase in the severity of winter storms, affecting peak stream flows and flooding. ☐ Changes in growing season conditions that could affect California agriculture, causing variations in crop quality and yield. ☐ Changes in distribution of plant and wildlife species due to changes in temperature, competition of colonizing species, changes in hydrologic cycles, changes in sea levels, and other climate-related effects.”

This section and the fire section fails to acknowledge the impact of climate on fire danger which I commented on in the previous DEIS. Specifically Urban Heat islands. As defined by the [EPA](#) “Buildings, roads, and other infrastructure replace open land and vegetation. Surfaces that were once permeable and moist generally become impermeable and dry.” This development leads to the formation of urban heat islands—the phenomenon whereby urban regions experience warmer temperatures than their rural surroundings.” 34.4 acres of buildings and asphalt that will absorb heat and reemit it creating both a surface and atmospheric “heat island” where the temperatures vary from 1.8 to 21 degrees higher over the built environment and nearby and drying out the atmosphere creating a perfect storm for wildfire was not even mentioned in any of the EISs.

The existing vineyards sequester carbon and absorb heat. Fire scientists have highlighted heat islands (built environments) combined with even 20 mph winds to be a dangerous combination for fire in “wildland urban interface” areas, which this will become with its half mile proximity to Shiloh Regional Park.

According to [the FEMA Heat Hazard map](#) Sonoma County is in the relatively high level at 99.17% We just had the hottest July in history. There is no question that this huge commercial space will create both atmospheric and surface urban heat island around the immediate facility and the surrounding neighborhoods where many seniors and low income families live (especially the low income mobile home parks). Climate change which is not going away will add to the wildfire danger and this mega casino will create a major heat island.

The proposal fails to acknowledge the contribution of several tons/day of solid waste to greenhouse gasses. I commented on this in the previous EIS. Sonoma County is working hard to achieve Zero waste, this will prevent that goal.

And, I mentioned electronic waste – which was not addressed in this version of the EIS.

The proposal is contrary to the Sonoma County General Plan Land Use Elements and goals among the highlights are: Page 25 Appendix E

Major industrial and commercial growth in cities with limited amount of growth in unincorporated areas

LU 1-2, LU-r Tribal trust lands Encourage tribes to consult with the county WHICH THEY DID NOT!

Retain low intensities

LU 5, LU 5,1 retain low intensities in community separators and avoid industrial Land Uses

Objective LU-1.2: Encourage the major share of commercial and industrial growth in the cities but accommodate a limited amount of this growth in unincorporated communities with urban services.

Policy LU-1r: Recognizing the County's General Plan and zoning are not applicable on tribal trust lands, encourage tribes to consult with the County on a government-to-government basis to develop mutually compatible land uses, considering both County and tribal General Plans, with particular focus on areas of joint interest and boundaries.

GOAL LU-2 Accommodate the major share of future growth within the nine existing cities and their expansion areas and within selected unincorporated communities, which are planned to have adequate water and sewer capacities.

Objective LU-2.1: Accommodate a population increase of about 19,064 residents over the 2000 baseline in the unincorporated areas outside of the designated Urban Service Areas.

Objective LU-2.2: Allocate the largest portion of unincorporated area growth to communities with public sewer and water services.

Objective LU-2.3: Limit the amount of population growth and development in rural portions of the County outside of the cities and the unincorporated communities.

GOAL LU-5: Identify important open space areas between and around the county's cities and communities. Maintain them in a largely open or natural character with low intensities of development.

Objective LU-5-1: Retain low intensities of use in Community Separators between and around cities and communities as designated in the Open Space and Resource Conservation Element.

Policy LU-5b: Avoid commercial and industrial land uses in Community Separators. Allow the full range of uses allowed in the agricultural and resource categories.

This project is in direct conflict

GOAL LU-9: Protect lands currently in agricultural production and lands with soils and other characteristics that make them potentially suitable for agricultural use. Retain large parcel sizes and avoid incompatible non-agricultural uses.

Objective LU-9.1: Avoid conversion of lands currently used for agricultural production to non-agricultural use.

Objective LU-9.4: Discourage uses in agricultural areas that are not compatible with long term agricultural production

The proposal is also contrary to the Open Space Conservation element. The structure(s) look like a prison compound and will ruin the aesthetic beauty of the area. The renderings in the proposal are misleading. OSRC 1d. The view from Shiloh Regional Park doesn't even show the massive "compound." This view is important to those residents who hike and bike ride. I raised this in my previous DEIS comments and it hasn't been addressed.

Section 311 Noise

This section is grossly understated and inadequate. Like many other parts of this proposal it does not take into account the highway noise in the surrounding areas caused by the 10,000+ vehicle and truck trips to the casino project. It also fails to acknowledge the sound of multiple sirens attending actions

at the casino. After the Grayton casino opened neighbors on both sides of Hwy 101 continue to complain about siren noise at all hours of the day and night. I raised this in my previous comments in August and it has not been addressed.

F-3

Project HRA

As I commented on in previous DEIS versions: these measurements do not consider the areas that are not in immediate proximity. They fail to address the cumulative impact of increased traffic on ORHW. And, for ROG-based combustion TACs from gasoline-fired vehicles, a TAC-specific weight fraction is applied to the EMFAC ROG emission **factor per South Coast Air Quality**

Management District's Combustion Emission Factors for portable internal combustion engines. It is assumed all on-road engines are equipped with catalysts. This is not an applicable measure for NORTH Coast emission factors.

Appendix I Traffic Impact Study

Again, only areas immediately around the casino project itself are analyzed. As I commented previously, this project will have traffic impacts beyond River Road in the Wikiup area which affect flow, emergency vehicles, and travel times.

Appendix L noise and vibration

As mentioned in my previous DEIS comments: noise along HWY 101 from Petaluma north carries into the neighborhoods and is increasingly disruptive. This was not addressed. The increased car trips and emergency vehicles will disrupt the quiet aesthetic of the neighborhoods. \$10,000 cars!!!!

Appendix N Wildfire

This proposal will substantially impair adopted emergency response plans.

Weather and winds will exacerbate wildfire risks and expose residents to pollutant concentrations from wildfire (as it did in 2017 and 2019) and the uncontrolled spread of a wildfire.

I mentioned in my previous DEIS comments the likely hood of a cigarette butt being tossed out the window as a gambler drives along Faught Rd (to avoid cops) or leaves to go home. I counted the butts in the parking lot of River Rock Casino last month (it's a no smoking facility) with ashtrays in the parking lot. In a 10foot by 10 foot area there were 26 butts. We cannot take a chance with our lives but putting this giant development in our quaint neighborhood.

According to California experts: Proper fire evacuation study should include the following. As you can see, the evacuation plans are woefully poor.

(a) A wildfire behavior study that meets the requirements of Section 65999.3. **This proposal does not include a fire behavior study.**

(b) A traffic engineering study that meets the requirements of Section 65999.4. **This study looks only at certain current peak hours on intersections close to the casino – it ignores the surrounding area.**

(c) (1) The best available routes for evacuation egress by populations within the development when threatened by wildfire, and concurrent routing for emergency vehicle access. **This is discussed in the fire**

section: unfortunately the available routes are the same routes that need to be used by existing residents for egress so the available routes will be jammed by thousands of inebriated gamblers.

(2) Mitigations to new development traffic impacts shall be engineered as required to maintain or improve the existing regional travel capacity of identified evacuation routes. **Mitigations are suggested but only address intersections near the casino project AND the neighbors do NOT want 4 lane roads in their neighborhoods, the will ruin the aesthetics of the quaint area.**

(3) The routes included in the evacuation plan shall include the entirety of the route, regardless of whether the route is located within the qualified area. **This proposal does NOT take into account the entirety of the routes. It fails to address the small sidewalkless roads in the Wikiup neighborhood.**

(d) (1) Temporary refuge areas for civilian populations in the event escape routes are lost due to unsafe conditions. **There is NO mention of refuge area!!**

(2) Temporary refuge areas shall include the exact location and the capacity for accommodation of civilian populations who are trapped within a development by wildfire movement and unable to safely access or use designated evacuation routes. **There is NO mention of refuge area!!**

(3) Temporary refuge area locations shall offer immediate access within the development, off-road parking, and access, and be of sufficient size and capacity for avoidance to life-threatening wildfire exposure, including smoke and radiant heat. **There is NO mention of refuge area!!**

(4) Temporary refuge areas may include commercial, private, or institutional locations constructed of fire-resistive materials meeting or exceeding the requirements established by Chapter 7A of Part 2 of Title 24 of the California Code of Regulations, developed parks, large parking lots, or similar sites.

(e) Strategies for addressing the needs of vulnerable populations both in evacuation inclusion and public education.

(f) A detailed discussion, for the benefit of the public and interested agencies, of the exact roles of the fire protection and law enforcement jurisdictions in ordering, supervising, and conducting emergency evacuations, with consideration of the availability of staffing during multiple wildfire events in or impacting the region. **This is very important and is missing from the proposal**

(g) Information regarding adjoining properties on all sides of the development, which shall include, to the extent that information is known, all of the following:

(1) Current land uses. **This is included.**

(2) Existing structures and densities. **This is include but will be transformed from agriculture into a concrete heat island that will exacerbate fire risk and wind.**

(3) Planned construction. **This is described.**

(4) Natural vegetation. **This is described**

(5) Environmental restoration plans.

(6) Roads. **Acknowledges that roads are too narrow!**

(7) Parks. **No mention of protection for Shiloh Regional Park!**

(a) An evacuation plan shall include a wildfire behavior study. The wildfire behavior study shall do all of the following:

(1) Identify proposed evacuation routes and temporary refuge area locations. **Evacuation routes do not do all of this.**

(2) Include a study of potential wildfire behavior, fire modeling, and determination of potential wildfire impacts affecting evacuation routes and temporary refuge area locations. **No study of wildfire behavior has been conducted**

(3) Determine locations where evacuation may be obstructed or where road users may be entrapped by fire trajectory, speed, or movement. **This is very important given the 2017 Tubbs fire that jumped the highway.**

(4) Validate safety of proposed temporary refuge area locations. **This is not included**

(5) Consider both diurnal and episodic foehn wind conditions, juxtaposition to native and ornamental fuels, adjacent topography, and historic wildfire behavior, including likely points of origin, for the specific site and region. **This is not included**

(6) Propose mitigations, as necessary, such as fuel modification or other treatments, to reduce wildfire impacts. **Vegetation ON the CASINO property is talked about but no other fuel modifications or treatments are identified for Windsor and Wikiup.**

(7) Determine and recommend evacuation window timing for designated evacuation routes, the period that the routes are likely available for safe travel, and under what conditions evacuation by those routes should be discontinued for safety reasons and populations redirected to temporary refuge area locations. **Window timing is discussed however it turns recommendation on their head by saying that casino operations should be shut down and guests allowed to leave.**

(b) A wildfire behavior study shall be subject to the approval of the responsible fire authority. **This has NOT been done!**

(a) An evacuation plan shall include a traffic engineering study conducted by a certified traffic engineer. **It is unclear that TJKM is 'certified'** The traffic engineering study shall do all of the following:

(1) Include a determination of both daily and peak travel capacity for designated evacuation routes and consider needs for concurrent emergency vehicle access. **Yes they look at PEAK times but only in intersections proximate to the casino – Old Redwood, Shiloh, 101 ramp, Hembre, they did not look at traffic impact further south on Old Redwood in the Wikiup neighborhood or on the Airport Blvd ramps. These are crowded during school hour pick ups and will be exacerbated by casino traffic.**

(2) Ensure that new development access is sufficient to accommodate travel by **the entire development's population to a point of safety within one hour of notification. As stated above this has not been addressed.**

(3) Consider existing and prior use of designated routes by regional populations and identify any potential reductions of travel capacity posed by the new development. **Not completed**

(4) Identify evacuation routing from the point of evacuation origin to locations of safety, where wildfire impacts to evacuees may be avoided, and recommend traffic improvements and mitigations as necessary to facilitate effective road travel. **The proposal is only concerned with casino guests – which is disgusting!**

(5) (A) Include a minimum of two designated routes of emergency access and egress that meet municipal traffic engineering standards for the local government. These routes shall not be obstructed by locked gates or other means, and shall be available for immediate access by civilian populations without third-party intervention. The routes shall also offer immediate access to emergency responders simultaneous to civilian evacuation, with access lanes of sufficient width to facilitate emergency vehicle movement. **This is unclear in the proposal**

(B) Additional routes may be required by any party reviewing the evacuation plan to accommodate evacuation traffic for larger developments. If the traffic engineering study determines that more than the two evacuation routes required under subparagraph (A) are needed to meet the one-hour evacuation standard under paragraph (2), then additional routes may be required for the development. For very small residential projects, a traffic study may find that one evacuation route sufficiently meets

the requirements of this paragraph. In either finding, the local government may modify the required minimum of two designated emergency access routes in concurrence with evacuation study recommendations and concurrence of fire and law enforcement officials. **This has not been done.**

(6) Ensure that designated emergency routes included in the traffic engineering study shall include all of the following:

(A) At least one permanent traffic lane in each direction of travel. Additional, temporary lanes may also be included to meet peak travel demand as may be required. **This is in the proposal, but the lane will be blocked by the thousands of casino car guest.**

(B) Municipal road traffic safety features such as lane controls and guard railing, and traffic calming features shall be minimized on those routes. **Since this is on county property, the Highway Patrol is responsible for traffic calming. They will be busy with Hwy 101, not panicked casino guests.**

(C) Fuel modification or other fire risk mitigations for evacuation routes as necessary to mitigate fire entrapment risks for civilian evacuees. **This has been discussed for casino evacuees only not for the residents across the street (Shiloh) or the mobile home park on Old Redwood.**

The use of contraflow, or conversion of use of both inbound and outbound traffic lanes for initial evacuation purposes, *shall not be part of the planned usage on the routes when direction or control of the use relies on immediate availability of local law enforcement or emergency services.* **This happened in the Tubbs and Kincaid fires. What will be done to prevent it.**

(E) In addition to minimum required travel lanes, temporary lanes for achieving peak travel capacity may be included in the study, such as median lanes, passing lanes, or wide shoulders, as may be directed by law enforcement to achieve peak travel capacity.

(7) (A) Ensure that routing over unimproved roads traversing mountainous terrain, presenting unreasonable or unsafe wildfire exposure, presenting significant traffic safety or movement concerns, or over routes not meeting city or county municipal road development standards are not used as evacuation routes for any new development. **This is not addressed**

(B) Limited, short-duration use of unimproved roads may be considered if a project can demonstrate that the use complies with subparagraph (C). Where these roads are designated for evacuation, they shall be maintained as readily accessible in perpetuity by the development. **Not addressed**

(C) A project proponent that considers limited, short-duration use of unimproved roads under subparagraph (B) shall demonstrate that the unimproved roads do all of the following:

(i) Provide adequate emergency travel times.

(ii) Provide mitigated traffic safety risks.

(iii) Avoid significant wildfire effects.

(iv) Meet municipal standards and no other routes are adequate.

(b) The traffic engineering study shall be developed by the project proponent and be incorporated into any initial study, negative declaration, mitigation negative declaration, or environmental impact report for the development, as may be required by the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code). **This has not been done**

(c) The traffic engineering study shall be submitted for review by law enforcement and fire officials and be subject to final approval by the local government. **This has not been done**

65999.5.

(a) An evacuation plan may utilize existing roads or sites for potential temporary safe refuge outside of, but adjacent to, the development when those sites offer best practical use and reasonable, rapid access.

(b) All ingress and egress access shall be part of the normal traffic circulation flow without controls that require special knowledge or assistance. **These would likely be off Faught road which is not mentioned and which will endanger residents.**

65999.6.

(a) Before a development subject to this chapter may be occupied, all data elements of the evacuation plan shall be preserved and maintained by the respective local government and consolidated in a countywide evacuation database for local fire, law, and emergency service agencies to execute efficient evacuations and mass notifications. **Not done**

Fire danger is too great for a project of this size. Please do not approve it on that issue alone!

From: Maureen Granados <maureentgranados@gmail.com>

Sent: Monday, December 23, 2024 9:58 PM

To: Broussard, Chad N <Chad.Broussard@bia.gov>

Subject: [EXTERNAL] Koi Nation Casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Come on, Chad,

It doesn't take a rocket scientist to see that this beautiful area near Windsor needs a casino like a fish needs a bicycle!!!

I live a mile away from the Graton Casino, and it has done nothing but bring traffic and riff raff to the area. The light from the place shines constantly, it's depreciated our property value, and it does NOTHING to better the local environment, not to mention you can get a case of lung cancer being in the smoke joint for 5 minutes!

If the Koi want a casino, have it put on their aboriginal territory and leave this location alone. It's not right, and it makes no sense!

Have a Merry Christmas, and think about what I just said...

Regards,

Maureen

From: Tavia Hayes <hayes26nana@gmail.com>
Sent: Monday, December 23, 2024 10:45 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear sir,

Please count me as a supporter of the planned casino in Windsor, CA.

It will be a lovely addition to our little town. It will save on wear and tear on our roads.

The other tribes are against it because they don't want to share the gambling money.

I am an Alaska Native and believe the Koi should have a chance to better their members.

Respectfully,

Tavia Hayes

724 Park Glen Dr.

Windsor, CA 95492

Hayes26nana@gmail.com

From: cherryblue009 <cherryblue009@aol.com>
Sent: Monday, December 23, 2024 11:22 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Proposed Koi Nation casino

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

-
Dear Mr Broussard,

I am writing to voice my concerns over the proposed Koi Nation casino in Windsor.

Firstly, the Koi Nation are a tribe not native to Sonoma County. The members of the tribes indigenous to the area have fought long and hard for recognition, and for rights to their ancestral lands. I believe that their protestations with regard to this proposed casino, and the harm it will cause to them and their homeland both economically and physically have not been heard, or given the weight which they so deserve.

Secondly, the stress to the immediate infrastructure in Windsor and the surrounding area of the proposed casino would be catastrophic. I have lived here for many years, and since 2017 have had to evacuate three times because of wildfires. During the Tubbs fire mandatory evac it was next to impossible to leave as the only/main street out (Old Redwood Highway) was at a dead stop due to hundreds of cars driven by those trying to flee. It was terrifying. Some of us barely made it out due to the congestion. Since that time several new developments in the area have made traffic and travel that much worse. I'd hate to think what would happen during a calamity.

Our natural resources would be strained to the breaking point, and harm to the environment, and wildlife would be irreversable.

Potentially crime would increase, property values decrease, and definitely, noise, increased visitors and traffic would destroy the natural, pristine beauty of our beloved Mayacamas

I ask that the application for permission for the Koi Nation casino be denied.

Thank you for your time,

Kerry Bligh

From: Areanna Galimba <areannagalimba@yahoo.com>
Sent: Monday, December 23, 2024 11:26 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Chad Broussard,

I am wanting to make it clear that I oppose as many other members of my tribe, surrounding tribes and citizens of neighboring towns the Koi Nations decision to build a casino outside of their homelands. There is clear disregard by the Koi Nation to the overall well being of my tribes and other neighboring tribes livelihood and will set a new standard across Indian country that we can step over each other to get to a higher level. My tribe is not the only tribe that this will affect, there are multiple tribes in the surrounding areas that have also filed lawsuits in opposition to the Koi Nations casino attempt and see the Koi Nations plans as a danger to all of Indian country and the butterfly affect this will have. Tribes across the nation should all be concerned with the way koi nation has decided to attempt multiple locations for their casino to be built so far from their homeland. It spits on the agreement our tribe had to make to put our land into trust, which was only possible because we had to agree to never build a casino in our own homeland and our only option was to find a location that is an hour from our homelands.

The work my aunt and former chairwomen Margie Mejia along with the tribal council have put in is being stepped on. The amount of sacrifice our council has done is immeasurable, their immediate families included. Its more than a slap in the face to my auntie Margie Mejia who is now gone. There are multiple tribal member that worked to get us to the point we are at who are also gone and its disheartening to know their work could be gutted by the koi nations decisions and disregard. Our council has put in countless hours, travel to our capitol, had to overcome countless "No"'s and some never got to see the fruit of their labor they accomplished. When ever I think of that it is haunting and heart breaking to me. For them to pour everything they have to the point where they were depleted because they just kept giving in hopes that their children and grandchildren would have new paths paved for them. Because that is who they did this for, it was not for recognition or accolades. They did it to get us out of the poverty and cycles of abuse in different forms. I can't imagine how much strength it took to try convince someone why we are worthy of access to our homeland and creating a community among each other. Only to return home No after No, year after year, sacrifice after sacrifice. Yet still be unwavering while brushing themselves off and tackle the problem and find new avenues to a "yes." The tribal council worked for 12 years going through hell and back because they see the value in their goal to elevate the quality of life for tribal members.

They have added years to our overall life expectancy because of the numerous resources they provide for example; rehabilitation, health insurance, covered my tutoring expenses when I was a child, my field trip to Washington D.C. while I was in middle school, organic produce to our tribal members, financial help with higher education, school supplies from kindergarten to the 12th grade, etc. these resources may not be available if the Koi Nation casino is approved. I have benefited greatly from all the different resources and I want them to be here for generations to come. I unfortunately have lost 5 babies during pregnancy but I hope one day to have a family that can use these resources that the council has worked to make happen. I want the children that live next door, up the street, and off of our homeland to have access to these resources for years to come.

To move forward with the Koi Nations plans truly feels like they will do this by any means and they don't care who they step on to get there. They have already attempted in Oakland, Richmond, Vallejo, Windsor, and Los Banos. Our tribe has only recently moved onto our homelands this year because of the hoops we had to go through to put our land into trust. Its infuriating to know that the Koi Nation has disregarded us while their process to move forward in their project has not been 1/16th of the fight we did. I cannot be understanding of the process the Koi Nation has chosen to take for their casino. I wholeheartedly do not want this casino to come into fruition because of how vile this process feels to my tribe as well as others. I am one of many that feel overlooked and disrespected by the Koi Nations actions. I am hopefully that this our concerns will not be overlooked by you and those with the power to move forward with the Koi Nations plans for a casino. I do not stand alone in my opposition to the Koi Nations plan for a casino. My tribe also doesn't not stand alone in our opposition to the Koi Nations casino. Graton, Cloverdale, Dry Creek all come to mind and I imagine there are numerous tribes that feel the same as myself and my tribe feels by the Koi Nations plans. My tribe and others do not want to feel the consequences because of this project. The work my tribal Council has done has personally done a 180 on my life. There are situations or options where I say " I've suffered enough" and leave, I can reach of better and more for myself because of the work the council has done. I know this is also true for the tribes in my area, they don't have to take the short end of the stick because it is their only option. We do not want to feel ignored by those in power to make this decision for The Koi Nation and in hand us, Lytton Rancheria band of Pomo Indians, Dry Creek Band of Pomo Indians, Kashia Band of Pomo Indians, Cloverdale Rancheria of Pomo Indians, and the Federated Indians of Graton Rancheria. While all tribes above have different resources, we have come together when situations call to lean on each other. We have put resources that can benefit our

communities as a whole. I don't feel I now can say the same for the Koi Nation, it is difficult to know they are willing to turn their back on all of us. Every tribe has felt the effects of colonialism and to absorb the weapon of individualism or us before everyone else is an ugly sight. Every tribe in opposition to the Koi Nation has all the work they have ever done is at the mercy of those on a tight rope while they come to a decision that will make waves that will be felt for decades and alter the course on how other tribal affairs will be able to proceed.

This Project has negative consequences for the property value to my community as well. I easily found that communities lose around 2% - 10% in property value because of multiple reasons, noise, traffic, crime, etc. In an already difficult economy I am concerned for my community. I can not turn away from the consequences families will face because of this casino is built. The Koi Nation has decided they are willing to let the community will take this hit. I have a lot of people that I care about that this will affect.

It is known that Sonoma County has an growing issue of human trafficking. I worry that the casino will increase an already alarming situation. Our most vulnerable members are already at risk are children, people who are with out homes, people who can't escape their employers, etc. I am in no way saying that I believe the Koi Nation will be involved with such awful practices. I am concerned that the casino could attract individuals or groups that would put the community at risk. I am nervous the casino will only add to this situation and can become a undesirable problem. I put children's safety over anyones feelings, so this is one of my biggest concerns with this casino. I hope you all feel the same and are not willing to overlook the harm that can come with this casino. We are all responsible for looking out for our community.

I am also concerned on the environmental effects this project will bring to land that I truly love and am proud to call home. I love that this area is small while still meeting all of my needs and do not wish to see a gorgeous part of town be changed into a gigantic resort.

What measures have they taken to protect the area I call home? Why do they not see value in their homeland for their project? We need to reevaluate our lens, because not every area of our earth needs to bring profit. I have no desire to see that land altered in this way.

I do not want to see other tribes feel the consequences of the Koi Nations actions and road they are paving that causes direct harm to what they should consider neighboring community. I urge you and all with the power to make this happen to take our concerns to heart. Please do not be the ones that set a dangerous standard across Indian country to bring harm to each other because we are willing to leave others out in the cold. Please do not be the ones that disrespect the work my tribe and neighboring tribes have faced to get us to where we are now. I am asking those in power to deny the Koi Nation there shameful strategies to bring my community and tribes harm with this casino. I am Urging Koi Nation to find a different solution to their goals that does not bring harm to the other Pomo Tribes and all of Indian Country. This is not our way.
Areanna Gabriella Corona Galimba

From: Darren D <darren.ad23@gmail.com>
Sent: Monday, December 23, 2024 11:54 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] FEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard,

I am writing to voice my strong opposition to the proposed Koi Nation casino project in Windsor, California. As a resident of the Lytton Rancheria, I am deeply concerned about the potential harm this project could cause to our ancestral lands, our community, and the town of Windsor as a whole. This proposal fails to respect the voices of Indigenous peoples who have deep-rooted connections to this region. It is troubling to see a tribe from a different county attempting to establish a casino on land that holds significant cultural and historical importance to our people. Such a project undermines the progress we have made in securing a stable and lasting homeland in Windsor, putting at risk the physical, economic, and cultural foundation we have worked tirelessly to build.

Additionally, the project raises serious concerns about its broader impact on the Windsor community. Increased traffic, noise, and crime are potential outcomes that would strain local resources and negatively affect the quality of life for residents. There are also risks of property value depreciation and long-term environmental damage. These concerns have already sparked widespread opposition from a range of elected officials, including Governor Gavin Newsom, the Sonoma County Board of Supervisors, the Windsor Town Council, State Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson, and U.S. Senator Alex Padilla.

In light of these significant issues, I strongly urge you to reconsider moving forward with this project. Thank you for your time and consideration of this important matter.

Darren Dickerson

From: Justin LeRette <justinlerette@gmail.com>
Sent: Friday, December 27, 2024 6:32 PM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Koi Nation Proposal Opposition

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello,

As a Sonoma County Resident and local business owner, I strongly oppose the Koi Nation Project.

I have first hand seen the community of Rohnert Park, a once quiet, thriving, and peaceful town, so negatively affected by having a Casino. I would hate for this same mistake to be made again in our area. The local governments have mis-negotiated this to the point where financially the benefits have far fallen short of the problems it has created.

I manage finance for many government employees and see financials for how Rohnert Park was managed due to the nature of my job, and the financials do not outweigh the issues the casino has created, in fact, it may be creating new issues of infrastructure.

Our economy is struggling, homelessness, drug trafficking, and crime are at an all time high, creating new budget and social issues.

I believe the Koi Nation Proposal would be a huge mistake for our area and strongly oppose it.

I also believe that the entire purpose of Native Tribal Gaming is to allow Native Americans whose land was taken, an opportunity to re seize those means. I believe it would be counter intuitive to allow an outside tribe to take an opportunity from a local tribe.

I strongly urge you to take these reasons into consideration.

I wish you the happiest of New Years ahead, and thank you for your time!

--

Justin LeRette
Investment Professional
JL Financial & Insurance Solutions

Direct: 707.400.4359
Office/Assistant: 707.400.4359
100 Professional Center Dr
Rohnert Park, CA 94928

CA Insurance License #0I91847

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From: Charles Wehn <ctwehn@gmail.com>
Sent: Friday, December 20, 2024 10:19 AM
To: Broussard, Chad N <Chad.Broussard@bia.gov>
Subject: [EXTERNAL] Shiloh casino project

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In my opinion there already are too many casinos in Sonoma county. Let them share the wealth with less fortunate tribes. Stop this project from going any farther.

Charles Wehn
Healdsburg

Lorraine Borel

12/15/2024

1. No to Koi Nation Casino Project
near Windsor, California
2. Harmful to community
3. Increased traffic, noise, crime
4. Depreciated property values
5. No consultation with
impacted tribes
6. Land that is far from
Koi nations aboriginal territory
7. Widespread opposition from
federal, state, and local
elected officials

Signed: Lorraine Borel
Healdsburg, CA.

PACIFIC REGIONAL OFFICE

2024 DEC 30 PM 12:57

BUREAU OF INDIAN AFFAIRS

PACIFIC REGIONAL OFFICE

12/16/2024

2024 DEC 30 PM 12: 51

BUREAU OF INDIAN AFFAIRS

Hello Chad ,

Our family, comprising, Michael, Agnes and Dane has resided at 152 Merner Dr., Windsor, for 24 years. We appreciate this neighborhood due to its safety, quiet atmosphere, proximity to grocery stores, and our workplace. Building a massive casino in this area would be misguided, as it would disrupt the community's cohesion. It would also introduce significant issues, including traffic, congestion, noise, pollution, and environmental degradation.

The vineyard serves as a firebreak during fires. If we are not cautious, the community may be affected again, particularly if this casino is permitted. Please no casino in this neighborhood!

We must prioritize people over profit!

Sincerely,
The Reiley's

12/17/24

I321

Elizabeth Pulchear
8797 Marianna Dr.
Forestville, CA 95436

PACIFIC REGIONAL OFFICE
2024 DEC 30 PM 1:06
BUREAU OF INDIAN AFFAIRS

RE: FEIS Comments, Shiloh Resort & Casino Project

Dear Regional Director Dutschke,

I am writing to you to express my serious concerns about construction of the Koi Nation's Shiloh Resort and Casino Project in Windsor, California. After a three year battle against the project, I feel the people impacted by the project have not "been heard and the "ram it down their throats" attitude continues. This entire process has been based on the Koi Nation's assertion that they have a historical connection to Sonoma County, yet their historical and ancestral lands are located in Lake County NOT Sonoma County.

The proposed Casino project is in a residential neighborhood located near elementary schools, parks and religion centers. We all know a Casino operating 24/7 for 365 days a year will negatively impact the entire community for many reasons.

- Neighborhoods - Quality of life: Traffic, Construction, noise, decline in property value, Crime
- Fire Danger - Clearly one of the most dangerous issues regarding the Casino and the influx of people and cars in an area where wildfires have and will occur. This endangers all of the community.

Elizabeth Pulcheon
8797 Marianna Dr.
Forestville, CA 95436

12/17/24

Re: FEIS Comments, Shuloh Resort & Casino Project

- Fire Danger (Continued) - The ability for people to evacuate during emergencies will be severely hindered by the additional people/traffic at the casino. Windsor's county roads are not equipped to handle during an evacuation emergency.
- Water Issues ~ Huge project = huge water needs.
- Waste Issues ~ Huge project = massive treatment facility.

Both water & waste issues pose a threat to the community (homes, businesses, vineyards). The "needs" of the casino somehow seem to "outweigh" the concerns of the established community and its residents.

- Quality of life - The community and environment will have to endure worsened air quality and the harmful climate impacts of a massive construction project and long term damage caused by one tribe's desire to build a casino.

As a resident of Sonoma County, I strongly urge you to consider the huge negative impact this project would have on all citizens involved, not just the Koi Nation (which does not have a historical connection to the area), when you make a final determination about this project. It seems like a dangerous precedent to set.

Respectfully,

Elizabeth Pulcheon (Elizabeth Pulcheon)

PACIFIC REGIONAL OFFICE

2024 DEC 30 PM 1:11

BUREAU OF INDIAN AFFAIRS

Dear Bureau of Indian Affairs.

I hope this letter finds you well. I am writing to express my concerns regarding the proposal for the Koi Nation to establish a casino in our community. While I acknowledge and respect the rights of Native American tribes to pursue economic development opportunities, I believe it is crucial to consider the potential impacts on our local community and environment.

The Koi Nation, while recognized as a sovereign entity, is not originally from this area. The establishment of a casino by a tribe that does not have historical ties to our region raises several questions about the long-term implications for our community. I am particularly concerned about the following issues:

1. **Cultural Disconnect:** The Koi Nation does not have deep historical or cultural ties to our community. This disconnect could lead to a lack of understanding and respect for local customs and values, which may hinder community relations and integration.
2. **Economic Impact:** While casinos can provide economic benefits, they can also have negative effects on local businesses. The introduction of a casino may draw customers away from existing establishments, potentially harming our local economy and leading to job losses in other sectors.
3. **Social Concerns:** The presence of a casino can bring with it various social challenges, including increased crime, addiction, and other societal issues. It is essential to consider whether our community is prepared to handle these potential consequences.
4. **Environmental Concerns:** The construction and operation of a casino may have detrimental effects on our local environment. It is vital to assess how this development will impact land use, water resources, and local ecosystems.

In light of these concerns, I urge the Bureau of Indian Affairs to carefully evaluate the potential consequences of allowing the Koi Nation to build a casino in our community. I believe it is essential to prioritize the interests and well-being of local residents and to foster open dialogue between the Koi Nation and our community members.

Thank you for your attention to this matter. I hope that you will consider our concerns seriously and engage with our community as this process moves forward.

Sincerely,

Richard Hernandez



-me

chadbroussard@bia.gov



LEGISLATIVE COUNCIL OFFICE

LEGISLATIVE COUNCIL OFFICE

LEGISLATIVE COUNCIL OFFICE

Mr. Broussard, I am extremely worried about the crime this casino may bring to the neighborhood.

A friend was staying at a hotel in Elk Grove, California that is nearby a small casino, she was told that to be sure to lock her car because there was so much thievery in that area due to the casino clientele.

Also, a friend that works in the police department in Sonoma County told me that the most calls that the department receives is from the Graton Casino in Rohnert Park. There is not a neighborhood near the casino but there are a few homes nearby that I am sure wish that casino had never been built near them!

Please consider the impact on the neighborhood that use the roads, hear the noise, disruption and destruction of property and behavior of those attending events, gambling and drinking on the premises. We do not need another casino that would benefit 80 plus Koi members.

There is enough construction going on in the area to help sustain the Construction Union workers. I listened to the zoom meeting awhile back and was extremely disappointed that the majority of those wanting the casino were those that were in the construction industry. They took up most of the time that evening and were allowed to speak and say the exact same thing over and over. Maybe they were paid to speak on the matter, what a scam!!

December 20, 2024

PACIFIC REGIONAL OFFICE

2024 DEC 30 PM 1:16

To: Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

From: Claire Berglund
522 Colonial Park Drive
Santa Rosa, CA 95403

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

Dear Regional Director Dutschke:

I am enclosing a previous letter sent to you regarding this issue which addresses fire, water, traffic congestion, safety, economic impacts, and other critical issues.

In addition, I would like to bring to your attention the fact that the location is most inappropriate for a Casino/Gaming project. This location is in the midst of a community of homes with children and elderly, churches, schools, and parks directly adjacent to the site.

Would you approve a Casino/Gaming project if you lived across the street from or adjacent to such a project?

I urge you to recognize that the site of the proposed project is most inappropriate for a Casino/Gaming project, in addition to all the other critical issues and impacts on the land and the community.

Sincerely,


Claire Berglund

August 12, 2024

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

Subject: EIS Comments, Koi Nation Shiloh Resort and Casino

Dear Regional Director Dutschke:

I am a Sonoma County resident and I oppose the Koi Nation's proposed fee-to-trust transfer of unincorporated land adjacent to the Town of Windsor for a hotel and casino gaming project. The draft environmental impact statement (DEIS) released on July 8, 2024, contains complex, technical information and is virtually impossible for a layperson to understand or comment on. Moreover, it does not adequately address the significant impacts this project will have on the surrounding community and Sonoma County if it is approved.

Sonoma County and the Town of Windsor have raised numerous concerns related to water supply, wastewater, traffic, wildfire risk and evacuation routes, law enforcement and public safety, and housing and other economic impacts. Sonoma County Tribes have also highlighted the impacts on them and their cultural resources. Many of the mitigation measures in the DEIS are framed as best management practices, but there is no guarantee that they will occur. I am very concerned that the Bureau of Indian Affairs is rushing this process, has not adequately considered the local environmental impacts, and cannot guarantee or enforce the mitigation that is proposed.

We support the local, indigenous tribes. This project is not right for Sonoma County and will do nothing to restore lands to the Koi Nation, whose homeland is in Lake County. The only way to avoid significant environmental impacts is for the Bureau of Indian Affairs to approve the environmentally preferred "no project" alternative in the DEIS.

Sincerely,

Clare Amelia Berglund
582 Colonial Park Drive
Santa Rosa, CA 95403

Dear, Chad Broussard

12/20/24

Hello, I'm voicing my concern about The Proposed Koi Nation Casino Project. This Project puts our recently established Lytton Rancheria Homeland and everything we fought so hard for, at risk.

There are a lot of family members that fought hard to get our land back, and they are no longer with us. It's a slap to the face to let the Koi Nation Project happen.

This Project gained a widespread opposition from federal, state, and local elected officials. This includes Governor Gavin Newsom, State Senator Mike McGuire, Congressman Jared Huffman, The Windsor Town Council, and also U.S. Senator Alex Padilla.

The Koi Nation Casino Project would do more harm than good to the town of Windsor, CA.

Thank you, for your Time
and Consideration on This matter.

Sincerely Gasold Bettega

BUREAU OF INDIAN AFFAIRS

2024 DEC 30 PM 12:06

PACIFIC REGIONAL OFFICE

Dear Chad Broussard
Hi, I want to voice my opinion
about the proposed Kai Nation
Casino Project.

PACIFIC REGIONAL OFFICE

2024 DEC 30 PM 12:08

BUREAU OF INDIAN AFFAIRS

Significant controversy has been raised by the proposed Kai Nation Casino in Windsor, especially in light of the disdain for the opinions of the local indigenous population. The fact that a tribe from a whole other county, with no historical connection to this region, and promoting a project on our ancient territory is extremely alarming. This behavior undercuts our cultural relevance and ties to the land in addition to disrespecting our heritage.

Additionally, the initiative seriously jeopardizes our newly created homeland, which we have worked so hard for to defend. Due to the possibility of increased traffic, noise, and violence in the town of Windsor, the casino may endanger both our physical safety and financial stability.

The seriousness of these issues is highlighted by the broad opposition from federal, state, and local elected officials, such as U.S. Senator Alex Padilla, state Senator Mike McGuire, Congressman Jared Huffman, Congressman Mike Thompson, the Windsor Town Council, the Sonoma County Board of Supervisors, and Governor Gavin Newsom.

Last but not least, the Koi Nation casino proposal ~~will~~^{will} negatively impact the ecology and our property values. Residents' quality of life may be negatively impacted by increased traffic and noise pollution, and the environmental effects of such a massive development may damage nearby ecosystems. Since this project jeopardizes our way of life and the area's natural beauty, the community's resistance is evident and well-founded.

12/20/24

Sincerely, Anyessa
Betts

December 20, 2024

PACIFIC REGIONAL OFFICE

2024 DEC 30 PM 1:15

BUREAU OF INDIAN AFFAIRS

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

Subject: FEIS Comments, Koi Nation Shiloh Resort and Casino

I've lived in Windsor since 1989. I've seen our traffic in and out of development as problematic. When we used to have events like Ironman Bicycling race which was something that happened for numerous years. We adjusted. Right now having the construction of low cost housing has been a nightmare on traffic and something that you always need to be aware and adjust the time you leave. Anytime the signal has issues at the intersection of Shiloh and Old Redwood you can see traffic backing up. Another intersection that is problematic is the intersection of Hembree and Shiloh. Another prime traffic time is after 3 pm when traffic out of our subdivision tends to increase due to people leaving for work on Shiloh Road from the Golf Course. I see our traffic in and out of Shiloh as one that can become problematic. We are a short distance from the freeway. I've been stuck in traffic many times trying to get to the freeway and sometimes coming home taking our freeway offramp. There have been times we couldn't take our freeway exit due to flooding and having to take another intersection. I see if we add another factor like a Casino that getting out of our neighborhood will be a nightmare. As it is with Home Depot and Walmart it is manageable and can take a few minutes to get out during high commute times. Adding a casino this could be something like the intersections near Coddington or Costco in Santa Rosa, I could see traffic backing up on the freeway.

Having a casino is something that you can't adjust. I know the city had planned to have a round a bout at the intersection of Old Redwood and Shiloh. I can't imagine how with a casino that is suppose to work. I was not present when the Tubb's fire came through. I was on vacation when that happened. When I returned it was problematic getting in and out due to barricades set up to protect our homes from people who shouldn't be in our neighborhood. Wildfires was an issue for a number of years. I don't believe that has gone away.

The recent storms through Northern California has caused flooding and I'm not certain if the recent transportation study addressed that. Our 101 offramp had been closed numerous times due to flooding in the extreme right lanes. Coming off the freeway at high speeds to flooded zone has caused them to divert the traffic to other off ramps. Has that been addressed if that should happen. Northern California gets lots of rain. Its not unusual for that happening and there is no one that has decided to build at that intersection to address that yet.

I can't imagine why with 2 casinos in place why a 3rd one is needed. If these places need to be around they need to be in a places that are not near family neighborhoods with children and lots of traffic. I've see when the Casino's have a special events it triples traffic. Giveaways that attract people to come in brings more traffic. Why do we want that to happen so close to our homes and neighborhoods? These other two casino are in areas that are not near large housing developments. Why is so difficult to have rules where they can be. Parking and more traffic is another factor that will be coming in the next couple of months with the apartment complex opening soon.

Another concern seems to be among the tribes in our local area. I have family that are part of the Red Hawk Casino. They relocated to be closer to their casino. That's why its confusing why this tribe from Lake County has tried to say this land is part of their tribe. Has that been truly understood and that this shopping around to find a better location as these local tribes are eluding to.

I was on the online meeting asking for feedback from the public. What I found unfair is that many were from the construction workers. Amazing when it was time to hear opinions that many would not give up their time. It made it unfair and a long wait to express opinion. After 3 1/2 hours I gave up as I felt it was not clear that the public actually got to express their opinion. If this was truly a way to have public opinion, I feel that it has not been given a great opportunity to do that. Then having this deadline during the holidays is another disadvantage. If you truly want public opinion, why haven't we been able to do that.

Please consider what we've dealt with before and adding another high-end traffic draw is something we do not need in Windsor. I hope this is not the end of this discussion and that I ask for more time to consider what I feel is something important.

Gayle Cunningham

PACIFIC REGIONAL OFFICE
2024 DEC 30 PM 12:44
BUREAU OF INDIAN AFFAIRS

December 20, 2024

Dear Bureau of Indian Affairs,

We are writing to say no to approving any more casinos in Sonoma County.

We also are opposed to any expansion of existing casinos.

Thank you.

Sincerely,

Handwritten signatures of Joseph Hernandez and Sylvia Zensen.

Joseph Hernandez
Sylvia Zensen

4655 Sullivan Way
Santa Rosa, Ca 95409

PACIFIC REGIONAL OFFICE
2024 DEC 30 PM 12:43
BUREAU OF INDIAN AFFAIRS

Amy Dutschke -Regional Director,
Bureau of Indian Affairs - Pacific Region
2800 Cottage Way Sacramento, Ca. 95825
FEIS Comments, Shiloh Resort and Casino Project


12-23-24

Dear Ms. Dutschke,

We are a fourth generation Sonoma County (Santa Rosa) family who have lived our entire lives in a very small circle of local geography. Our home is situated in the unincorporated community of Larkfield, and we have been keenly aware what kind of near immediate destruction, devastation, death, and havoc can be caused by a runaway firestorm like the Tubbs Fire did in the early morning hours of that day in October 2017. We lost thousands of homes in this community and Coffee Park (where the firestorm jumped the 6 lane freeway), and suffered scores of deaths in about 8 hours' time. But you surely know all that very well.

We evacuated nearly immediately, and our car then crawled up to the corner of Deerwood Drive and Old Redwood Highway, where the traffic then pretty much stopped. You may recognize Old Redwood Highway, as this is the main access road to the proposed Shiloh Resort and Casino Project. It's about a 2 or 3 minute drive from our house. Yes, truly about 2 or 3 minutes by car, quicker, as the "crow flies."

You probably know the rest of that story, but our subdivision was spared the destruction of any of the homes or structures, and for that we were quite thankful. Scores of our long-time friends, relatives, and business contacts were not spared that same happy ending. Many lost everything but the few things that they could remember to grab and the clothes that they quickly grabbed in the night's darkness on their way out the door.



Why do I tell you a very shortened version of our night of fleeing in terror several years ago? Because within 20 minutes of our home, we already have two existing Vegas-style gambling casinos (Graton Rancheria in Rohnert Park and River Rock Casino in Geyserville), and the BIA seems to be getting ready to shove another one "down our throats" (my words) between the other two. All that in spitting distance of an existing **wildland urban interface**.

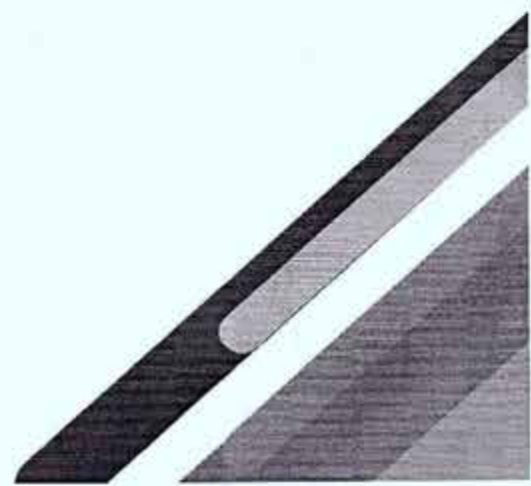
This particular project seems to be nearly a classic example of a tribe that is "casino shopping", in search of any land, far from the Koi Nations "aboriginal territory" or their ancestral land nearly fifty miles away. As the crow flies, of course it's quicker. Koi Nations well-heeled out of state partners and their lawyers simply need to figure out the best scenario to stuff an ill-advised mega project (with Koi Nation's plan of a casino floor and hotel, this amounts to around three quarters of a million square feet), and minimize the impact of a project so large outside the existing neighborhood and communities. And then all we have to add is all the gamblers and vehicles that got them there, along with all the casino employees and maintenance and security staff. **Surely** you must be kidding.

You already know all the scores of reasons why not to allow this project to be taken into trust. The safety and future of these vulnerable communities will never be the same if you were to allow this monstrosity to see the light of day. Please give Windsor, Larkfield and the rest of Sonoma County a break.

We respectfully request that the BIA doesn't allow this rushed and ill-advised project and property to be taken into trust. Thank you for your serious consideration.

Warm regards,

John and Kathleen Henderson
70 Hop Ranch Road
Santa Rosa, Ca. 95403



PACIFIC REGIONAL OFFICE

Dear Mr. Broussard,

DEC 30 PM 12:03

I am writing to address my increasing concerns surrounding the verdict of allowing the Koi Nation Casino Project to move forward in my town of Windsor California. As a resident, I am fully opposed to the project. The Koi Nation Casino Project will carry negative impacts for our town and the surrounding areas. This project will increase traffic noise and crime in our community, depreciate our property values, and cause environmental harm. If approved, this mega casino will threaten safe evacuation routes for thousands of residents. The Koi Nation's proposed casino site is situated along a major evacuation route outside of Windsor in an area designated as "wildland-urban interface." Human lives are not the only ones at stake. Construction would endanger wildlife habitat, fragmenting wildlife populations and their ecosystems. I am not writing solely as a resident of the area this casino will effect but also as a member of Lytton Rancheria tribe of Pomo Indians. As someone whose ancestral homelands will be greatly impacted, I feel there has been a complete disregard of the voices of the ~~XXXXXX~~

Native Peoples Indigenous to the Proposed Site. After Casino Shopping in other areas, not their homelands, the Koi Nation has been turned down for the same reasons our community does ~~not~~ want the Casino built here. To see an out of county tribe push a project on our ancestral land is insulting, deeply infuriating and very disrespectful. After the fact that our tribe is prohibited from ever opening any gaming in the whole Sonoma region, feels like a slap to the face to my people. We were made to jump through hoops to appease those in power to be able to live on our own ancestral lands. This project puts our recently established homeland ~~and~~ and everything my Grandmother and Tribal ~~Council~~ Council fought so long and hard for at risk, economically and physically. Even with widespread opposition from Federal, State, ~~and~~ local elected officials, and surrounding federally recognized tribes it seems to be moving forward with this unwanted project. Please ~~hear~~ hear my voice and the voices of our community to help stop this moving forward.

Thank you,
Ebony Steele