

FINAL ENVIRONMENTAL IMPACT STATEMENT

REDDING RANCHERIA
FEE-TO-TRUST AND CASINO PROJECT

VOLUME I - RESPONSE TO COMMENTS

FEBRUARY 2024

LEAD AGENCY:

U.S. Department of the Interior
Bureau of Indian Affairs
Pacific Region Office
2800 Cottage Way # W2820
Sacramento, CA 95825

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SECTION 1.0
INTRODUCTION

The Notice of Availability (NOA) of the Draft Environmental Impact Statement (EIS), available in **Attachment B**, for the proposed Redding Rancheria Fee-To-Trust And Casino Project (Proposed Project) was published by the Bureau of Indian Affairs (BIA) in the Federal Register on April 10, 2019, and the EPA subsequently published a Notice of Availability in Federal Register on April 19, 2019, which provided a 45-day comment period ending on June 3, 2019. This comment period was extended two weeks to June 17, 2019. On May 20, 2019, a public hearing was held at the Redding Memorial Veterans Hall, during which verbal and written comments on the Draft EIS were received. In total, the BIA received 201 comment letters and 47 verbal public hearing comments during the comment period for the Draft EIS.

This Final EIS has been prepared according to the requirements of the National Environmental Policy Act (NEPA), which state that the lead agency shall consider and respond to all "*substantive comments*" on the Draft EIS which were timely submitted during the public comment period (40 Code of Federal Regulations [CFR] § 1503.4).

The Final EIS is organized into two volumes:

- Volume I contains this introduction chapter, all comments received on the Draft EIS (listed in **Section 2.0** and reproduced in **Attachment A**), general responses to frequently submitted comments (**Section 3.0**), and responses to substantive comments raised in the individual comment letters (**Section 4.0**). If any comment required revisions or clarifications to the Draft EIS text, corresponding text changes to the EIS are noted within the responses to comments.
- Volume II is composed of the revised text of the EIS and provides new and supplementary appendices that were not included in the Draft EIS.

The response to comments provided herein, along with the revised EIS text, will be considered by the BIA prior to issuing a decision on the Proposed Action. Following the 30-day waiting period for this Final EIS, the BIA may decide on the Proposed Action. At the time the BIA makes its decision, a concise public Record of Decision (ROD) will be prepared that states: what the decision is, identifies all the alternatives considered in reaching the decision, and discusses preferences among alternatives based on relevant factors including economic and technical considerations and the BIA's statutory mission (40 C.F.R § 1505.2). The ROD will also identify and discuss all factors that were considered in making the decision and discuss whether all practicable mitigation measures have been adopted to minimize environmental effects. If all practicable measures are not adopted, the BIA must state why such measures were not adopted. The Council of Environmental Quality (CEQ) requires that, "Mitigation and other conditions established in the EIS or

during its review and committed as part of the decision shall be implemented by the lead agency or other appropriate consenting agency" (40 C.F.R. § 1505.3). Specific details of any adopted mitigation measures shall be included as appropriate conditions in the ROD by the lead agency.

SECTION 2.0
COMMENT LETTERS

This section lists all of the comments received by the U.S. Department of the Interior Bureau of Indian Affairs (BIA) on the Draft Environmental Impact Statement (EIS) during the comment period. The comments presented herein were submitted to the BIA by way of letter, email, written comment cards, and verbally at the public hearing held for the Draft EIS. All received comments are indexed in **Table 2-1** and presented in their entirety in **Attachment A**. Comments are organized into five categories: those submitted in writing by public agencies and other governmental entities (A); those submitted in writing by tribal governments (T); those submitted in writing by individual private citizens and/or organizations, including comment cards received at the May 20, 2019, public hearing (I); those given orally during the public hearing as recorded on the official public hearing transcript (PH); and those submitted using a form sponsored by Speak Up Shasta (F). In addition to category, each comment letter is assigned a unique number (e.g. A1), and then individual comments within the letters have been bracketed into specific substantive comments, which are then numbered (e.g., A1-1) for ease of reference. **Section 3.0** contains general responses to issues raised in the letters, and **Section 4.0** contains responses which correspond to the numbered comments in **Attachment A**.

TABLE 2-1
COMMENT INDEX

GOVERNMENT AGENCIES (A)			
Number	**Agency**	**Name**	**Date**
A1	Central Valley Flood Protection Board	Andrea Buckley, Environmental Services and Land Management Branch Chief	4/16/2019
A2	State Board of Equalization	Sen. Ted Gaines (Ret.)	5/20/2019
A3	Congress of the United States, Washington, DC	Doug LaMalfa, Member of Congress	5/10/2019
A4	City of Redding, CA	Julie Winter, Mayor	5/22/2019
A5	U.S. Environmental Protection Agency	Connell Dunning, Acting Manager Environmental Review Branch	6/3/2019
A6	Shasta County	Leonard Moty, Chairman	6/11/2019
A7	Shasta Regional Transportation Agency	Daniel S.Little, AICP Executive Director	6/17/2019
A8	California Department of Transportation	Marcelino Gonzalez	6/17/2019
A9	California Department of Fish & Wildlife	Tina Bartlett, Regional Manager	6/17/2019
A10	California State Lands Commission	Eric Gillies, Acting Chief	6/17/2019
A11	Central Valley Regional Water Quality Control Board	Clint E. Snyder, Assistant Executive Officer	6/17/2019

TRIBES (T)			
Number	**Tribe**	**Name**	**Date**
T1	Paskenta Band of Nomlaki Indians	Andrew Alejandre, Chairman	4/25/2019
T2	Wintu Tribe of Northern California	Wade A. McMaster, Chairman	5/8/2019
T3	Nor Rel Muk Wintu Nation	John Hayward, Chairman	5/24/2019
T4	Wintu Tribe of Northern California	Gary Rickard, Vice Chairman	6/17/2019
T5	Redding Rancheria	Jack Potter Jr., Chairman	6/17/2019
T6	Paskenta Band of Nomlaki Indians	Kaighn Smith, Jr., Attorney	6/17/2019
T7	Nor Rel Muk Wintu Nation	John Hayward, Chairman	6/19/2019
INDIVIDUALS/ORGANIZATION (I)			
Number	**Individual**	**Organization**	**Date**
I1	Sean Beam	Fredericks Peebles & Morgan LLP	10/8/2015
I2	Jim Morrow		5/16/2019
I3	Buck & Sue Lang		5/17/2019
I4	Alan Hill		5/20/2019
I5	Ambar Moltammeo	CNIGA	5/20/2019
I6	Bonnie Hurlhey		5/20/2019
I7	Bryan Crum		5/20/2019
I8	Dale Smith		5/20/2019
I9	Danika Adams		5/20/2019
I10	Dennis Grady		5/20/2019
I11	Devin Ryan	Redding Rancheria	5/20/2019
I12	Diana Kirschman		5/20/2019
I13	Donna Buchanan		5/20/2019
I14	Donna Fitzpatrick	One Way Construction	5/20/2019
I15	Ed/Carolyn Shaw		5/20/2019
I16	Gary Morris		5/20/2019
I17	Jasmine Romero	Redding Rancheria	5/20/2019
I18	Jean Fellman	Chum Creek Bottom Homeowners and Friends	5/20/2019
I19	Jeannie Winstead		5/20/2019
I20	Jenni Patterson		5/20/2019
I21	Karen Bither		5/20/2019
I22	Kianna Benner	Win-River/Redding Rancheria	5/20/2019
I23	Larry Fultz	Redding Rancheria	5/20/2019
I24	Mae Guthrie		5/20/2019
I25	Michael Schraner		5/20/2019
I26	Patricia Furnari		5/20/2019
I27	Rich Todd		5/20/2019
I28	Tom Kirschman		5/20/2019
I29	Vicki Killion		5/20/2019

I30	Wendalyn Jesson		5/20/2019
I31	Wendy Fooh		5/20/2019
I32	*no name*		5/20/2019
I33	Debe Hopkins		5/20/2019
I34	Michael Crook		5/22/2019
I35	Savanna Edwards		5/23/2019
I36	Daniel McGann & Blossom Hamusek		5/23/2019
I37	Don Barich		5/23/2019
I38	Michael Middendorp		5/24/2019
I39	Hazel Hughes		5/25/2019
I40	Shelly Hutchinson		5/26/2019
I41	Kathy Grissom		5/26/2019
I42	Lang M. Dayton, Chair.	Trails & Bikeways Council of Greater Redding	5/29/2019
I43	Paul Hughes		5/29/2019
I44	Trish Stoffers		5/30/2019
I45	Edmond Brewer		6/1/2019
I46	Cheryl Schmit, Director	Stand Up For California	6/3/2019
I47	Bob Madgic		6/5/2019
I48	Dale Widner		6/6/2019
I49	L.M.		5/31/2019
I50	J. Scott Foott		6/11/2019
I51	Jacquelyn Jansen		6/11/2019
I52	Kathyrn Patterson		6/11/2019
I53	Lynn Clevenger		6/11/2019
I54	Robert Fuller		6/11/2019
I55	Cathy Wheeler		6/12/2019
I56	Dennis Daniel		6/12/2019
I57	Irene Jackson		6/12/2019
I58	Christine Miille		6/12/2019
I59	Kimberly Mare & David Bailey		6/12/2019
I60	Denal & John Jurin		6/12/2019
I61	Marjorie Riffel		6/12/2019
I62	Mimi Ramsey		6/12/2019
I63	Anne Wallach Thomas, Director	Shasta Living Streets	6/13/2019
I64	Mary Ocasion		6/13/2019
I65	Mimi Moseley		6/13/2019
I66	Rick Ramos		6/13/2019
I67	Tom Reemts	Churn Creek Bottom: Home Owners and Friends Org.	6/13/2019
I68	Annette Littier		6/14/2019
I69	Gary Bossuot		6/14/2019
I70	Glen Harmer		6/14/2019

I71	Mark Coulter		6/14/2019
I72	Marylin Meissner		6/14/2019
I73	Noah Megill		6/14/2019
I74	Pam Harmer		6/14/2019
I75	Rod Dole	Harrisons marine and RV	6/14/2019
I76	Walter Cole		6/14/2019
I77	Bruce Armstrong		6/15/2019
I78	Cade Wright		6/15/2019
I79	Hannah Littier		6/15/2019
I80	Jody Clark		6/15/2019
I81	John Donoghue		6/15/2019
I82	Mary O'Grady		6/15/2019
I83	Paul & Conni Kerr		6/15/2019
I84	Tim W. Brown		6/15/2019
I85	David and Donna Williamson		6/16/2019
I86	Doug Wenham		6/16/2019
I87	Tammy Cole		6/16/2019
I88	Candie Sullivan		6/17/2019
I89	David Ledger		6/17/2019
I90	James M. Lynch	K&L GATES LLP	6/17/2019
I91	John C. Dunlap, Consulting Engineer		6/17/2019
I92	Melinda Brown		6/17/2019
I93	Randy Carter	Speak Up Shasta Association	6/17/2019
I94	Red and Maria Emmerson		6/17/2019
I95	Robbie Wharton		6/17/2019
I96	Margaret Wood		6/14/2019
I97	David Harvey		6/16/2019
I98	Al Shufelberger		6/17/2019
I99	John Livingston	Shasta Group of the Sierra Club	6/17/2019
I100	Linda Perkins		6/17/2019
I101	Dave Cox	KIXE TV	6/17/2019
I102	Karen Bither		6/17/2019
I103	Royal M. Mannion		6/17/2019
PUBLIC HEARING SPEAKERS (May 20, 2019) (PH)			
Number	**Individual**	**Title**	**Organization**
PH1	Jack Potter Jr.	Chairman	Redding Rancheria
PH2	John McGinnis	Tribal Council Member	Bear River Band of the Rohnerville Rancheria
PH3	Alan Ernesto Philips		District Agricultural Association

PH4	Susan Jensen	Executive Director	CA Nations Indian Gaming Association
PH5	Esteban Pizano		
PH6	Joanne McCorley		Shining Care
PH7	Maria Orozco		Redding Rancheria
PH8	Diane Kinyon		
PH9	Craig A. Wages Jr.		
PH10	Tom Reeits		
PH11	Frank Treadway		
PH12	Joe Furnari		
PH13	Michael Burke		Non-Project Management
PH14	Linda L. Mitchell		
PH15	Garth Sundberg		Trinidad Rancheria
PH16	Sean Murillo		
PH17	Robb Korinke		Speak Up Shasta
PH18	Alan Hill		
PH19	Christ Hues		Win - River Casino
PH20	Jim Morrow		
PH21	Dan Frost		
PH22	Nick Gardner		
PH23	John Livingston		Sierra Club
PH24	Mike Schraner		
PH25	Cameron G. Frank		
PH26	Pam Hughes		
PH27	Julie Buick		
PH28	Tom Sanchez		
PH29	Lane Rickard		
PH30	Cindy Lamkin		
PH31	Agnes Gonzalez		Pit River Tribe
PH32	Margo Wilson		
PH33	Kay Wilson		
PH34	Anne Bonacci		
PH35	Danielle Brewster		Women's Health Specialists & Northern Women's Health Network
PH36	Kristyn Kuroki		
PH37	Ken Murray		
PH38	Todd Giles		
PH39	Shannon Giles		

PH40	Gary Rickard		Wintu Tribe of Northern CA
PH41	Terry Pelazo		CCHC
PH42	Carl Bott		
PH43	Tricia Kaplanis		
PH44	Gene Malone		Wintu Tribe & Toyon Wintu Center
PH45	Ann Malotky		
PH46	Ed Shaw		
PH47	Phyllis Solberg		
Speak Up Shasta Form (F)			
Number	**Individual**	**Organization**	**Date**
F1	Bradford Evans		6/11/2019
F2	Audrey Locker		6/11/2019
F3	Bryan Doan		6/11/2019
F4	Cathy Mayer		6/11/2019
F5	Charle Hazlehurst		6/11/2019
F6	Charlotte Bailey		6/11/2019
F7	Christie Bovee		6/11/2019
F8	Corrie Miller		6/11/2019
F9	Danny Cannon		6/11/2019
F10	Darrel Kelley		6/11/2019
F11	Denise Boehle		6/11/2019
F12	Gene Crow		6/11/2019
F13	Greg Boehle		6/11/2019
F14	Heidi Price		6/11/2019
F15	Jean Russell		6/11/2019
F16	Joe Vanenkenvort		6/11/2019
F17	Kathryn Patterson		6/11/2019
F18	Kayla Brown		6/11/2019
F19	Leann Owens		6/11/2019
F20	Marsha Nelson		6/11/2019
F21	Nancy Edmonds		6/11/2019
F22	Patricia Soileau		6/11/2019
F23	Patrick Crowley		6/11/2019
F24	Rae Dean Bible		6/11/2019
F25	Reagan Locker		6/11/2019
F26	Richard Johnson		6/11/2019
F27	Robert Smart		6/11/2019
F28	Shirley Goldstein		6/11/2019
F29	Susan Crowley		6/11/2019
F30	Terry Cowan		6/11/2019
F31	Linda Gebauer		6/12/2019

F32	Sarah Wickenheiser		6/12/2019
F33	Tami Dwinell-Nisbet		6/12/2019
F34	Van Williams		6/12/2019
F35	Mikayla Loucks		6/12/2019
F36	Kile McClure		6/13/2019
F37	Fran Mazet		6/14/2019
F38	George Boreham		6/14/2019
F39	Glen Harmer		6/14/2019
F40	Gordon Woodman		6/14/2019
F41	Joan Gillette		6/14/2019
F42	Joslyn Mitchell		6/14/2019
F43	Joyce Cannon		6/14/2019
F44	Lance Smith		6/14/2019
F45	Marilyn Selke		6/14/2019
F46	Michael Mitchell		6/14/2019
F47	Nick & Jackie Shidlovsky		6/14/2019
F48	Penny Woodmansee		6/14/2019
F49	Phyllis Schwerin		6/14/2019
F50	Robbin Borden		6/14/2019
F51	Stan Bridges		6/14/2019
F52	Steven Anderson		6/14/2019
F53	Brent Collins		6/15/2019
F54	Brian Rice		6/15/2019
F55	Brian White		6/15/2019
F56	Crystal Wadzeck		6/15/2019
F57	Diana Gifford-Tuggle		6/15/2019
F58	Jan Clark		6/15/2019
F59	Jan Garner		6/15/2019
F60	Jeanette M Bell		6/15/2019
F61	Jen Skelton		6/15/2019
F62	Jonni-Lynn Malley		6/15/2019
F63	Kristi Schafer		6/15/2019
F64	Melody Fowler		6/15/2019
F65	Phyllis Lawler		6/15/2019
F66	Ross Jones		6/15/2019
F67	Willene v. L. Pursell, Ph. D.		6/15/2019
F68	Monty Apple		6/16/2019
F69	Stephen Pursell		6/16/2019
F70	Tammy Cole		6/16/2019
F71	Brenda Wilson		6/17/2019
F72	Janet Londagin		6/17/2019
F73	Jean Murillo		6/17/2019
F74	Joyce Hankin		6/17/2019

F75	Julia Screechfield		6/17/2019
F76	Leslie Eddleman		6/17/2019
F77	Nick Gardner		6/17/2019
F78	Norman Brewer		6/17/2019
F79	Richard Fyten		6/17/2019
F80	Shaun Vega Sanchez		6/17/2019

SECTION 3.0
GENERAL RESPONSE TO COMMENTS

This section contains responses to comments that were received during the public comment period on the Draft EIS and listed in **Section 2.0**. Comments may be addressed with a general response in this **Section 3.0**, individually in **Section 4.0**, or by reference to a specific response. This format eliminates redundancy where multiple comments have been submitted on the same issue. Based on the comments received for the Draft EIS, revisions have been made in the Final EIS (Volume II) to improve language, enhance data, and provide clarification. The location of the changes to the Draft EIS are identified in the applicable responses and are consistent with the CEQ Regulation 40 CFR § 1503.4 and the BIA NEPA Guidebook (59 IAM 3-H), Section 8.5.3.

3.1 NEPA PROCEDURAL ISSUES

3.1.1 EXTENSION OF THE COMMENT PERIOD

Summary of Comments: The Bureau of Indian Affairs (BIA) received several comments requesting an extension of the original comment period on the Draft EIS

Response: The comment period for the Draft EIS is stipulated by the National Environmental Policy Act (NEPA), 40 CFR §1506 which states that, subject to certain exceptions, agencies shall allow not less than 45 days for comments on draft EISs. The BIA announced the publication of the Draft EIS in the Federal Register with publication of the Notice of Availability (NOA) on April 10, 2019 (Federal Register Volume 84, page 14391). This announcement was also published in the Sacramento Bee on April 14, 2019, and in the Record Searchlight on April 14, 2019. On April 19, 2019, the EPA published an NOA in the Federal Register (Federal Register Volume 84, page 16485). In response to public requests, the original comment period was extended by the BIA for an additional two weeks to June 17, 2019. The BIA announced this notice of comment period extension in the Federal Register on June 6, 2019 (Federal Register Volume 84, page 26440). This announcement was previously published in the Sacramento Bee on May 20, 2019, and in the Record Searchlight on May 19, 2019. In total, the comment period for the Draft EIS was 68 days, or 23 days more than is required under NEPA. Thus, the Draft EIS comment period and the comment period extension are consistent with 40 CFR §1506.

3.1.2 COMPLETENESS OF THE DRAFT EIS

Summary of Comments: Some comments received were expressions of opinions that the Draft EIS was incomplete without citation of factual evidence or comments on substantive environmental issues. One commenter stated that the Draft EIS should have considered the 2003 disenrollment of a number of individuals from Redding Rancheria.

Response: As stated in Draft EIS, Section 1.1, the Draft EIS was "prepared pursuant to the National Environmental Policy Act (NEPA) to assess the environmental impacts of proposed federal actions

intended to improve the long-term economic vitality and self-governance of the Redding Rancheria (Tribe)…." As stated in Draft EIS, Section 1.4 "NEPA requires that an EIS be prepared for major federal actions that could significantly affect the quality of the human environment. This document was completed in accordance with applicable requirements, including those set out in NEPA (42 USC § 4321 *et seq*.); the Council on Environmental Quality (CEQ) Regulations for Implementing NEPA (40 CFR § 1500 – 1508); and the BIA's NEPA Guidebook (59 IAM 3-H)."

As set forth in 40 CFR § 1500.1, NEPA "is a procedural statute intended to ensure federal agencies consider the environmental impacts of *their actions* in the decision-making process." (*emphasis added*). The determination of membership status is an action carried out by the Redding Rancheria Tribal Council as a sovereign nation and is not a federal action carried out by the BIA. Therefore, the disenrollment of individuals in 2003 is separate and independent from the fee-to-trust acquisition that requires discretionary approval by the BIA. As the disenrollment of individuals has already occurred and is therefore not a reasonably foreseeable direct or indirect consequence of the Proposed Action, an analysis of the effects of disenrollment on those individuals from the disenrollment is not warranted in the EIS. Similarly, as the Proposed Action would not result in any changes to the membership status of those individuals or others, cumulative effects associated with Tribal membership would not occur.

Some comments on the Draft EIS made constructive suggestions regarding instances in which the text could be clarified or changed to include additional details. Text in the Final EIS was modified to incorporate such information.

3.1.3 SUPPLEMENTAL EIS OR RECIRCULATION OF DRAFT EIS

Summary of Comments: Some comments state that the Draft EIS omitted or overlooked important facts. Some commenters state that a supplemental EIS should be prepared or the Draft EIS should be recirculated.

Response: Neither the implementing regulations for NEPA (40 CFR §1500 – 1508) or the BIA's NEPA Guidebook (59 IAM 3-H), includes any procedures or requirements for recirculation of a Draft EIS by the original Lead Agency. However, 40 CFR §1502.9(d) provides guidance on circumstances under which a lead agency should prepare and publish a Supplemental Draft EIS. These regulations provide that the agency should prepare a supplement to the Draft EIS if the agency makes substantial changes in the proposed action that are relevant to environmental concerns or there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. The agency may also prepare supplements when the agency determines that the purposes of NEPA will be furthered by doing so.

Substantial changes relevant to environmental concerns in the Proposed Action have not been made, nor has a new alternative been introduced as the Proposed Action. Similarly, there are no significant new circumstances or information relevant to environmental concerns and bearing on the Proposed Action or its impacts. In response to comments received on the Draft EIS, text and analyses contained in the EIS have been supplemented, modified, updated, improved, and factual corrections have been made. While new information has been presented, the information has not resulted in substantial changes in the EIS's

conclusions regarding the environmental impacts of the Proposed Action or the identification of any new significant impacts. The level of analysis presented in the EIS constitutes the 'hard look' required by NEPA, as described in the *Robertson* v. *Methow Valley Citizens Council* ruling.[1] For these reasons, a supplemental EIS is not warranted.

3.2 NON-NEPA ISSUES

3.2.1 EXPRESSIONS OF OPINION AND NON-SUBSTANTIVE COMMENTS

Summary of Comments: Some of the comments received were expressions of opinion either for or against the Proposed Project. These included statements that the Tribe is undeserving of the economic benefits of the Proposed Project. Other comments summarized the alternatives and/or findings of the Draft EIS. Additional comments did not raise any substantive environmental issue.

Response: Federal agencies must follow the requirements in the CEQ NEPA Regulations, 40 CFR § 1500, when responding to comments. As set forth in 40 CFR § 1503.4, "[a]n agency preparing a final environmental impact statement shall consider *substantive comments* timely submitted during the public comment period. The agency may respond to individual comments or groups of comments." (*emphasis added*) Comments are generally considered "substantive" if they: 1) Relate to inadequacies or inaccuracies in the analysis or methodologies used; 2) Identify new impacts or recommend reasonable new alternatives or mitigation measures; 3) Involve substantive disagreements on interpretations of significance and scientific or technical conclusions. According to 40 CFR §1500.1, the goal of NEPA is to ensure that relevant environmental information is identified and considered early in the process in order to ensure informed decision making by federal agencies and that the public has been informed regarding the decision-making process. Comments received that further NEPA's purposes are included and responded to within this Final EIS. Responses are not required for comments that do not raise a substantive environmental issue, such as comments merely expressing an opinion. However, such comments have been included within the administrative record and thus will be considered by the BIA in its decision on the project.

3.2.2 COMPLIANCE WITH GAMING REGULATIONS AND LEGISLATION (MATTERS BEYOND THE SCOPE OF THE EIS)

Summary of Comments: A number of comments raised concerns regarding the legality of gaming on the project site, and whether the circumstances of the Redding Rancheria (Tribe) warrants an exception to the requirements of federal Indian law including the Indian Gaming Regulatory Act (IGRA). Other comments question the Tribe's historical connection to the Strawberry Fields Site, and how such a connection or lack thereof would affect the Tribe's standing under IGRA.

Response: General Response 3.2.1 (above) explains that NEPA does not require an EIS to provide detailed responses to comments that fail to raise substantive environmental issues. Comments addressing gaming eligibility under IGRA do not raise substantive environmental issues; therefore, no response is

[1] Source: FindLaw website, accessed October 4, 2019 at: https://caselaw.findlaw.com/us-supreme-court/490/332.html

required. For avoidance of doubt, however, all relevant and timely comments – whether or not raising substantive environmental issues, and whether or not the subject of a detailed environmental response in this EIS - have been (and will be) carefully considered as part of applicable agency decision-making on the Proposed Action.

3.3 PURPOSE AND NEED

Summary of Comments: Several comments were received regarding the purpose and need of the Proposed Project. Some comments state that the purpose and need is overly focused on economic considerations. Others state that the Draft EIS purpose and need is not sufficiently specific, or that there is not a persuasive connection between the purpose and need and the Proposed Action.

Response: Pursuant to 42 U.S.C. § 4336a and 40 CFR § 1502.13, an EIS must state the underlying purpose and need for the proposed agency action. Draft EIS Section 1.2 describes the purpose and need for the Proposed Action, which is to "facilitate Tribal self-sufficiency, self-determination, and economic development" consistent with "both the Department's land acquisition policy as articulated in…25 C.F.R. Part 151 and the principal goal of IGRA as articulated in 25 U.S.C. § 2701." This would allow the Tribe to use its limited Rancheria lands for Tribal government and services for its citizens. Section 1.2 further explains the Department's need, pursuant to 25 C.F.R. §§ 151.10 and 151.12, to act on the Tribe's fee-to-trust application for the Strawberry Fields site.

This statement of purpose and need properly addresses multiple factors, including the Tribe's objectives; relevant federal law, regulations, and policy; and the Department's need to act on a properly filed application. It is broad enough to allow the Department to consider a range of reasonable alternatives, such as alternative development types, alternative development locations, and alternative development intensities, and it is reasonable in light of the factual background presented in Draft EIS Section 1.3. The purpose and need statement therefore satisfies applicable requirements.

An Economic Analysis was prepared by Pro Forma Advisors LLC and included as Appendix A to the Draft EIS. As described in Section 2.0 of the Draft EIS, all impacts discussed under Alternatives A, B, C, and E were described as a net change assuming the closure of the existing Win-River Casino; while Alternatives D, F, and G assume that the existing Win-River Casino would remain open. The Pro Forma Advisors analysis found that while the existing Win-River Casino provides the Tribe with socioeconomic benefits, the Proposed Project (i.e., Alternative A) would best facilitate Tribal self-sufficiency, self-determination, and economic development.

3.4 PROJECT DESIGN

Summary of Comments: Some comments state that the project design for Alternative A is not attractive and that is resembles Las Vegas style facilities. Many comments voice disapproval for the location of the casino and amphitheater.

Response: As discussed in Section 2.11.2 of the Draft EIS, Alternative A would result in increased employment, economic growth, and would result in increased demand for goods and services. Of the

alternatives evaluated in the Draft EIS, Alternative A would provide the best opportunity for the Tribe to secure a reliable and sustainable revenue stream (see **General Response 3.3**). As described in Draft EIS Section 2.3.2 (see *Renovation of Existing Casino for Tribal Governmental Uses*), Alternative A includes the closure of the existing Win-River Casino and the conversion of that facility into tribal services and housing uses. The environmental effects of renovating the existing Casino are addressed Draft EIS Section 4.0 under each respective issue area. The amphitheater described in Draft EIS Section 2.0 has been removed as a project component. Also, subsequent to the publication of the Draft EIS, a Public Safety Building has been included as an option to provide police, fire and emergency medical response services to the Strawberry Fields Site. See Final EIS Volume II, Section 2.3.2 for a description of this option, as well as an enhanced description of the architectural features of Alternative A. For additional information regarding project alternative sites, see **General Response 3.5** below.

See **General Response 3.2.1** regarding expressions of opinion. Whether a building is attractive or not is subjective. The EIS objectively analyzes the aesthetic impacts of the project alternatives in Section 4.13. As discussed therein, Alternative A is consistent with typical roadside development adjacent to I-5, which includes large-scale, freeway-facing commercial uses bordering the Strawberry Fields Site to the east and north (i.e. Mt. Shasta Mall, the multi-story Hilton Garden Inn, the FedEx freight distribution center, Costco, and Hilltop Mall). Also see **General Response 3.13** regarding the aesthetics of the project alternatives.

3.5 ALTERNATIVES

Summary of Comments: Several comments were received concerning the alternatives addressed in the Draft EIS. Generally these comments were directed to the following areas: 1) the Alternatives Analysis fails to evaluate the Redding Rancheria's need to generate governmental revenues; 2) the elimination of alternatives to relocate the Tribe's existing casino was unsupported; 3) some alternatives addressed were opined as unviable, specifically Alternative A, B, and C; 4) a modified Alternative F alternative should have been addressed; and 5) a number of specific additional alternatives were recommended. Comments made on the Draft EIS indicated that expansion of the existing casino was preferred over relocation of the Win-River Casino.

Response: Pursuant to 42 U.S.C. § 4332 and 40 C.F.R. § 1502.14, an EIS must address a reasonable range of alternatives to the Proposed Action. In this context, "reasonable alternatives" include options that are technically and economically feasible and meet the purpose and need for the proposed action. An EIS must also evaluate a "no action" alternative. The primary purpose of an alternatives analysis is to inform reasoned decision-making and public participation. Consistent with that purpose, an EIS must consider enough alternatives to permit a reasoned choice but need not present in-depth analysis of every conceivable option. CEQ's NEPA regulations direct lead agencies to limit their consideration to a reasonable number of options. For alternatives eliminated from detailed study, an EIS should provide a "brief discussion" of the reasons for elimination.

3.5.1 PURPOSE AND NEED

Please refer to **General Response 3.3** regarding the Proposed Action's purpose and need and the Tribe's

revenue generation. The purpose is to "facilitate Tribal self-sufficiency, self-determination, and economic development" consistent with "both the Department's land acquisition policy as articulated in…25 C.F.R. Part 151 and the principal goal of IGRA as articulated in 25 U.S.C. § 2701." The EIS contains a reasonable range of alternatives to meet this purpose and need, including different development types, different development locations, and different development intensities. As explained in the EIS and supporting studies, some of the alternatives evaluated in detail were more effective at addressing the purpose and need than others.

3.5.2 RANGE OF ALTERNATIVES

The EIS provides a detailed evaluation of a reasonable range of alternatives to the Proposed Action (A) Proposed Project, (B) Proposed Project with No Retail Alternative, (C) Reduced Intensity Alternative, (D) Non-Gaming Alternative, (E) Anderson Site Alternative, (F) Expansion of Existing Casino Alternative, and (G) the No Action Alternative. As noted above, these alternatives involve multiple development types (including both gaming and non-gaming development), multiple development intensities, multiple development sites, and the option of taking no action at all.

Pursuant to 40 CFR §1502.14, Section 2.4 of the Draft EIS provided a discussion of alternatives that were considered but eliminated from further study and the reasons for them having been eliminated. Some would not reasonably accomplish the purpose and need of the Proposed Action. Others would not significantly differ (environmentally or otherwise) from alternatives that were evaluated in detail and were therefore determined not essential to permit a reasoned choice.

In theory, the range of alternatives could be infinitely expanded to address slight variations in square footage, land-use, location, site planning, and other variables. But NEPA does not require consideration of every conceivable option or combination of options. The range of alternatives considered in the EIS highlights relevant tradeoffs, facilitates a reasoned choice among key issues, and provides the interested public with information about the comparative merits of different options. Therefore, the range of alternatives satisfies NEPA's "rule of reason."

Numerous comments proposed specific new alternative sites, or changes to the alternatives listed in the Draft EIS. These comments are addressed below and are grouped by alternative site or area of commenter concern.

3.5.3 VIABILITY OF ALTERNATIVES A, B AND C

The economic viability of Alternatives A, B and C was analyzed in a report titled Redding Rancheria Strawberry Fields EIS Economic Analysis that was prepared by Pro Forma Advisors and included in the Draft EIS as **Appendix A**. Further analysis by Pro Forma Advisors is included in the Final EIS as **Appendix L**. Taken together, these expert technical analyses confirm the economic viability of Alternatives A, B, and C. Among other things, they explain effects on patronage and revenue, including the importance of the Strawberry Fields Site's location adjacent to Interstate 5. They also evaluate the economic viability of each of the alternatives addressed in detail in the EIS.

A few commenters disagreed with Pro Forma Advisors' analysis. A substantial portion of the disagreement appears to center on the level of importance ascribed to location – in particular, proximity to Interstate 5. It should be noted that at least one of the commenters expressing disagreement with the Pro Forma Advisors analysis has itself decided to develop – and, subsequently, expand – a gaming facility adjacent to Interstate 5. Please see **Appendix L** for more information.

It is also worth noting that the primary purpose of an EIS is to address environmental factors. And while NEPA's definition of "environment" is broad enough to encompass socioeconomic factors, the EIS process is not intended to serve as a vehicle for suppressing economic competition. Here, it appears that the vast majority of comments expressing concern about the viability of Alternatives A, B, and C were submitted by the Tribe's economic competitors – and, further, there is a concern that many of the comments could allow those competitors to obtain the Tribe's confidential business information and strategic analyses. This is not an appropriate use of the EIS process. The information provided in the EIS and its appendices is sufficient to facilitate informed public engagement and agency decision-making, consistent with NEPA's purposes.

3.5.4 OTHER ALTERNATIVES

Alternative Sites

One of the criteria relevant to the feasibility of any project or alternative is site ownership. Sites not within the Tribe's ownership or control are not reasonably feasible alternatives for this Proposed Action (though the mere fact of Tribal ownership is not necessarily enough to establish feasibility either). The following table is presented to show sites owned by the Tribe. Parcels that comprise the Strawberry Fields Site, the Anderson Site, and the Win-River Casino Site are shaded in gray.

Parcel Number(s)	Description	Acres	Title	Comments
048-400-005	River Tsalmi Course Pioneer Ln.	30.41	Fee	1/2 mile northwest of Strawberry Fields Site. Donut shaped parcel comprised of green belt
048-540-036	River Tsalmi Golf Course Idianwood Dr.	1.93	Fee	1/2 mile northwest of Strawberry Fields Site
049-390-036	Parking "K" / Creekside	7.69	Fee	Adjacent to and north of Win-River Site
049-390-039	18083 Clear Creek Road	5.00	Fee	Adjacent to and north of Win-River Site
049-400-003	Parking "B" (NE)	0.90	Fee	Win-River Casino Site
049-400-015	Parking "G" (SW)	1.30	Fee	Win-River Casino Site
049-400-019	Parking "J" (SE)	0.90	Fee	Win-River Casino Site
050-010-001	Eastside Road #1	4.90	Fee	East of Win-River Site
050-010-004	8039 Eastside Road	5.90	Fee	East of Win-River Site
050-010-011	8041 Eastside Road	0.95	Fee	East of Win-River Site
050-010-012	8043 Eastside Road	11.19	Fee	East of Win-River Site
055-010-011	I-5 Property	50.10	Fee	Strawberry Fields Site
055-010-012	I-5 Property	30.00	Fee	Strawberry Fields Site
055-010-014	I-5 Property	15.80	Fee	Strawberry Fields Site
055-010-015	I-5 Property	30.89	Fee	Strawberry Fields Site
055-020-001	I-5 Property	25.10	Fee	Strawberry Fields Site
055-020-004	I-5 Property	75.00	Fee	Strawberry Fields Site
055-030-020	Adra Lane Property	3.00	Fee	Adjacent to and south of Strawberry Fields Site
055-210-011	Knighton Road	38.60	Fee	Knighton Road Site
055-270-003	Knighton Road (7579 Riverland Dr.)	6.20	Fee	Knighton Road Site

068-020-064	Churn Creek Health Clinic	0.69	Fee	2 miles north of Strawberry Fields Site
068-020-065	Churn Creek Health Clinic	0.93	Fee	2 miles north of Strawberry Fields Site
101-040-039	Liberty Street Health Center	2.00	Fee	4 miles north of Strawberry Fields Site
201-720-004	Anderson Land	24.50	Fee	Anderson Site
201-720-006	Anderson - Bingham	1.00	Fee	Adjacent to and south of Anderson Site
201-720-013	Anderson Land	17.26	Fee	Anderson Site
201-720-014	Anderson Land	11.02	Fee	Anderson Site
201-730-001	Anderson Land	2.50	Fee	Anderson Site
049-370-005	Redding - Pierce	2.00	Trust	North of Win-River Casino Site
049-380-012	Redding - Lowery	0.22	Trust	North of Win-River Casino Site
049-390-037	Redding - Lowery	63.89	Trust	Adjacent to and north of Win-River Casino Site
049-390-038	Clear Creek Property (Swarts)	5.00	Trust	Adjacent to and north of Win-River Casino Site
049-390-040	Clear Creek Property (Swarts)	15.77	Trust	Adjacent to and north of Win-River Casino Site
049-400-002	Parking "A" (NE)	0.70	Trust	Win-River Casino Site
049-400-004	Parking "C" (NE)	1.00	Trust	Win-River Casino Site
049-400-005	Parking "D" (NE)	1.09	Trust	Win-River Casino Site
049-400-006	Casino	1.21	Trust	Win-River Casino Site
049-400-007	Admin/Community Center	1.60	Trust	Win-River Casino Site
049-400-014	Parking "F" (SW)	1.63	Trust	Win-River Casino Site
049-400-016	Parking "H" (SE)	1.30	Trust	Win-River Casino Site
049-400-017	Parking "I" (SE)	1.00	Trust	Win-River Casino Site
049-400-023	Parking "E" (NW)	1.00	Trust	Win-River Casino Site
049-400-027	Headstart	1.06	Trust	Win-River Casino Site
Source: Redding Rancheria [2] Note that those parcels that comprise Alternatives A through F are shaded in gray.				

The parcels listed in the table above fall into four broad categories, which are:

1. Parcels that comprise Alternative A through F that are shaded in Gray. Because these alternatives are already evaluated in the Draft EIS, they are not potentially new project alternative sites.
2. Relatively small or irregularly shaped parcels that are not conducive for large scale commercial development, and thus are not appropriate sites for project alternatives.
3. The Clear Creek properties (see below), which include Clear Creek and its banks, extensive wetlands, and irregular topography. They also lie within the 100-year floodplain.
4. The Knighton Road and Lowery sites. Please see below for discussion of these sites.

Alternative F Variant – Larger Expansion of the Existing Casino

At least one comment (**Comment T6-17**) proposed a variant of Alternative F that would be comprised of a larger buildout and a slightly different configuration of the project components. This option is a variation on Alternative F, but it does not present a materially different set of environmental considerations, impacts, or conclusions. To the extent this variant differs from Alternative F, it is in the commenter's assessment of financial viability. As noted above, this disagreement appears to stem from a difference of opinion regarding the importance of proximity to Interstate 5. Pro Forma Advisors found that projected annual revenue at the Strawberry Fields site was more than twenty times projected annual revenue of Alternative F. Even the somewhat larger expansion contemplated in this Alternative F variant would not result in a materially different conclusion. And the additional square footage would make it more difficult for the Tribe to use limited Rancheria lands to meet the needs of its growing population.

[2] Source: Spreadsheet provided by Redding Rancheria, November 2019.

Please see the Final EIS Volume II, **Appendix L** prepared by Pro Forma Advisors, for more information on the Alternative F variant.

Alternative F Variant – Expansion of the Existing Casino Operations onto the Lowery Site

One comment (**Comment T6-15**) states that an adjacent 63-acre parcel to the north of the existing Win-River Casino Site should have been considered. This comment appears to be essentially a second variant of Alternative F.

As explained in the EIS and supporting appendices (including analysis by Pro Forma Advisors), Alternative F has limited revenue generation potential because it is not proximate to (nor visible from) Interstate 5, an issue that would apply equally if Alternative F operations extended onto the Lowery Site. Please see above and Appendix L for additional information. In addition, Alternative F has been carefully designed to fit on the existing Win-River Casino site; it is not necessary to move it to a different location.

It is also worth noting that the Lowery Site is separated from the Alternative F site by Clear Creek and its 100-year floodplain. Thus, use of the Lowery Site to accommodate some or all of an Alternative F variant would present similar environmental issues to those already considered in the context of the Strawberry Fields site and the Anderson Site – i.e., development along a fish-bearing waterway – but without (a) the same ability to address purpose and need (as compared to Strawberry Fields Site and the Anderson Site) or (b) the potential benefits of re-using the existing Win-River Casino site (as compared to the version of Alternative F presented in the EIS).

Please see the Final EIS Volume II Section 2.10.8 for more information.

No Action Alternative

Some comments (e.g. **Comment T6-15**) state that the Draft EIS did not consider the alternative of the Tribe continuing to operate its existing Win-River Casino on an "as is" basis. Such comments are not correct. Alternative G, the No Action Alternative, specifically addresses the alternative of continuing to operate the Tribe's existing casino. Draft EIS Section 2.11.2 compares Alternative G to the other alternatives, including Alternative A, the Proposed Project.

Tribal Services and Housing Elements of Project Alternatives

Some commenters questioned the reasons for the Tribe's plans to provide tribal services and housing on its Rancheria lands; please see Section 1.3 for more information. The Tribe already provides tribal services in facilities located on the Win-River Casino Site. Under the gaming alternatives, the existing casino on the Win-River Casino Site would no longer host gaming operations, and thus would be available to facilitate an expansion of the Tribe's existing governmental services. The existing hotel would be compatible with residential/housing uses, and thus can be utilized for these purposes without the need for substantive external improvements. For these reasons, improvements at the existing Win-River

Casino Site for tribal services and housing would not have significant environmental impacts, as any improvements would occur within the footprint of the casino and hotel structures. Final EIS Section 2.3.2 has been updated to clarify the reason for any internal improvements. Additionally, to account for the traffic generated by the increase in Tribal services from the re-purposing of the existing casino, the Traffic Impact Study conservatively assumed that the 1/3 of the existing traffic generated by the Win-River site would continue to occur (see Final EIS **Appendix Q**, page 79).

Vineyard Alternative and other Agricultural Alternatives

At least one commenter (e.g., **Comment I90-12**) stated that the Vineyard Alternative, which was eliminated from further study in Draft EIS Section 2.10, should be subject to further consideration. As described in Draft EIS Section 2.10.2, the Vineyard Alternative was eliminated from further study for a number of reasons, including that is it unlikely that this alternative would be economically feasible and thus would not meet the purpose and need of the Proposed Action as described in Draft EIS Section 1.2 to promote economic development opportunities and the self-sufficiency of the Tribe. As described therein, the relative lack of other vineyard developments in the region is sufficient basis for concluding that the economic prospects of such a development are not substantial for purposes of achieving the purpose and need. Consequently, a detailed financial feasibility analysis is not warranted.

Other commenters suggested agricultural alternatives such as vegetables or establishing a nursery. Similar to the Vineyard Alternative, these alternatives would not meet the purpose and need of the Proposed Action to promote economic development opportunities for the Tribe.

Knighton Road Site

At least one comment suggested that the Knighton Road site be evaluated in the EIS as an alternative location. This site, between 40 and 45 acres in size, is located approximately 1.5 miles south of the Strawberry Fields Site, west of Interstate 5 and on the north side of Knighton Road. Site constraints render this alternative location infeasible. The property is smaller than both the Strawberry Fields Site and the Anderson Site and it includes a seasonal creek and drainage feature significantly limiting both buildable area and ingress and egress routes. Please see the Final EIS Volume II Section 2.10 for more information.

Anderson Mill Site

One commenter (**Comment I99-12**) suggested consideration of a former wood products processing facility in the City of Anderson as an alternative location. Although not specifically identified, it appears the referenced site is a former Shasta Paper Company mill. This site is not a reasonable alternative and including it in the EIS is not necessary to facilitate reasoned decision-making. It is not owned by the Tribe, has a history of contamination, and is subject to various liens and abatement orders[3]. Further, this site is not located in close proximity to Interstate 5, limiting the potential for additional revenue generation necessary to offset the foregoing or accomplish the purpose and need for the Proposed Action.

[3] Source: Record Searchlight website, accessed September 10, 2019 at https://www.redding.com/story/money/business/2017/03/20/officials-frustrated-lack-cleanup-former-mill/99431730/

Clear Creek Site

The same comment (**Comment I99-12**) also recommended consideration of a location along Clear Creek. Although the commenter did not identify specific parcels, the proposed area appears to be west of both South Market Street and the existing Win-River Casino site. This site is not a reasonable alternative and including it in the EIS is not necessary to facilitate reasoned decision-making. It is not owned by the Tribe. Although the specific parcel or parcels were not identified by the commenter, this area consists of a significant number of wetlands and floodplains. Moreover, this location presents environmental issues and feasibility challenges very similar to those already evaluated in connection with Alternative F and variants thereof.

Water and Wastewater Combinations

At least one comment (**Comment T-24**) states that the alternatives analyzed in the EIS do not properly reflect the various combinations of different water supply and wastewater disposal options. This is not correct. Each water supply option and wastewater treatment and disposal option has been analyzed within the EIS for each alternative. The water supply source would have no bearing on the treatment and disposal of effluent, with the exception of siting consideration to achieve minimum buffer requirements between the wastewater disposal systems and drinking water wells. As described in the EIS, with either the off-site or on-site water supply option, wastewater would be treated on-site to meet disinfected tertiary recycled water standards under Title 22 of the California Code of Regulations or treated by the City of Redding's wastewater treatment plant. Sections 4.3, 4.10, and 4.14 of the EIS address the potential environmental effects of water supply and wastewater treatment and disposal. It is not necessary or warranted to devote a separate alternative for each combination of water / wastewater improvements as such variations on infrastructure combinations would have very limited differences in environmental effects. Circumstances in which other environmental elements are affected by water / wastewater options are analyzed in those EIS sections that analyze the affected environmental study area.

3.6 SOCIOECONOMIC CONDITIONS

3.6.1 GAMING SUBSTITUTION EFFECTS

Summary of Comments: Some comments state that the Draft EIS did not adequately assess substitution effects to competing gaming businesses, including tribal casinos. Other comments state that the Draft EIS incorrectly concluded that such substitution effects would be less than significant. At least one comment states that the Draft EIS did not provide evidence that substitution or competitive effects typically dissipate with the passage of time.

Response: As a practical matter, most proposed projects that involve substantial economic development will compete at some level with existing businesses, including tribal businesses. The issue for consideration under NEPA is whether competitive effects will result in significant environmental consequences. This issue of competitive or substitution effects are fully evaluated in Draft EIS Section 4.7 and in Draft EIS Appendix A. As stated in Draft EIS Section 4.7, the largest Alternative A substitution effects to a gaming facility is anticipated to occur with the Pit River Casino, and such effects

would be less than significant.

Alternative A substitution effects to other competing casinos are anticipated to be less than the 7.2 percent substitution effect on the Pit River Casino, and thus would also be less than significant. For example, substitution effects in the first full year of Alternative A operations are projected at approximately 5.8 percent of the Paskenta Band's Rolling Hills Casino revenues. The Paskenta Band engaged the services of GMA Advisors, which estimated that the substitution effect from Alternative A would reduce the Rolling Hills Casino earnings before interest, taxes, depreciation, and amortization (EBITDA) by between 35 percent and 38 percent (see **Comment T6-01**). EBITDA is a measure of cash flows, and is approximately equal to net revenues less operating expenses. GMA Advisor's EBITDA estimate is not corroborated by Pro Forma Advisors. As described in Final EIS Appendix L, Pro Forma Advisors estimates that Alternative A would reduce the Rolling Hills Casino EBITDA by approximately 7.7 percent during the first full year of Alternative A's operations. As described in Final EIS Appendix L (see Paskenta T-6.1), GMA Advisor's estimate of declining EBITDA at the Rolling Hills Casino is unrealistic because the model used by GMA underestimates the level of market growth at 0.8% despite other developments, resulting in an overestimate of substitution effects, and the use of an unrealistic assumption of how much of a decline in revenue would translate into EBITDA.

As stated in Draft EIS Section 4.7, competitive effects are likely to diminish after the first year of the Preferred Alternative's operation and once local residents experience the casino and return to more typical spending patterns. This statement is supported by evidence included in Draft EIS Appendix A. Specifically, the quantitative analysis performed by Pro Forma Advisors (Draft EIS Appendix A) estimated that it would take approximately eight years for substitution effects to the Pit River Casino decline to zero under Alternative A.

3.6.2 NON-GAMING SUBSTITUTION EFFECTS – IMPACTS TO LOCAL BUSINESSES

Summary of Comments: Commenters expressed concerns that the Proposed Project would result in loss of patronage to local restaurants, theaters, and other businesses.

Response: Impacts to local businesses were addressed within Section 4.7 Socioeconomic Conditions of the Draft EIS. As concluded in this section, there would be no significant non-gaming substitution effects as a result of operation of the project alternatives, including the gaming alternatives. In fact, as described in Final EIS Appendix L casinos can have a positive impact on local businesses, because:

1. Casino visitors stop at local retail outlets and restaurants.
2. Long-distance patrons stay at area hotels; even in markets with casino hotels, non-casino hotels enjoy boosts in occupancy.
3. Casino expenditures on local goods and services put more money into the local economy.

It is the case that the operation of the Proposed Project (Alternative A) is projected to cause the sales of sporting goods retailers located in the City of Redding to decline by approximately 24.1 percent during the first established year of Alternative A operations. As described in Draft EIS Appendix A, there is one large-scale competitive outdoor retailer within the 120-mile market radius (Dick's Sporting Goods).

Additionally, there are a number of other smaller competitive sporting stores (i.e. Sports Ltd, Big 5, Sportsman's Warehouse, etc.) and other national chains such as Target, Walmart, etc. that also sell similar products.

It was estimated that the City of Redding had $34.8 million in retail sales associated with sporting goods stores. The two largest sports retailers, Dick's Sporting Goods and Big 5 Sporting Goods, likely represent nearly half of all sales in the City of Redding (47 percent). As such, the remaining 24 sporting goods stores would potentially represent the remaining decline of 14.3 percent of sales or hypothetically less than one percent per store if each store had equal sales, which would not result in store closures. The large-scale sports retailers would be more directly competitive of the proposed sporting good store. These retailers (Dick's Sporting Goods and Big 5 Sporting Goods) are national sporting goods retailers already in many markets with a comparable regional sports retailer. Specifically, most of the competitive large-scale outdoor sports stores are located over two-hours south of the alternative sites where there is a significantly larger number of available population within comparable market sheds. Therefore, these large corporations have experience and strategies for adjusting to new competition in their market area. Final EIS Section 4.7 has been revised to include this clarification.

3.6.3 LOCAL SOCIOECONOMIC EFFECTS

Summary of Comments: Several comments state that the relocated Win-River Casino would increase gambling addiction, crime, homelessness and other undesirable outcomes.

Response:

Problem Gambling

As described in Draft EIS Section 4.7.1, the existing Win-River Casino is located less than two miles from the Strawberry Fields Site. Thus, the relocation of the existing casino under Alternative A would not increase the availability of gaming venues to persons who are at risk of problem gambling. The Tribe also contributes funds to the State of California to fund programs designed to address problem gambling. These payments are made pursuant to the Tribal- State Gaming Compact between California and the Tribe (see Final EIS, Volume II, Section 1.5.1). For these reasons, and as described in Draft EIS Section 4.7.1, the effects of Alternative A on problem gambling would be less than significant. Additionally, as described in Draft EIS Section 4.7.1, mitigation described in Draft EIS **Section 5.7**, would further reduce this less-than-significant impact.

Homelessness

Homelessness and the presence of homeless persons can affect any parcel of land. There is nothing unique about the parcels that comprise the project alternatives that would make them more or less attractive to homeless persons. Development of the parcels would, if anything, render such parcels less attractive to transient persons desiring to establish tents and sleeping spaces on the parcels. Related thereto, the operation of the project alternatives will have a less than significant effect on the incidence of homelessness in the surrounding community. Please see Final EIS Appendix L, prepared by Pro Forma Advisors, for more information on the affects to homelessness.

Substance Abuse, Mental Health, Prostitution and Human Trafficking

Undesirable social outcomes such as substance abuse, other unhealthy consequences, and crime, are potential negative outcomes associated with problem and pathological gambling. Because the increase in the incidence of problem gambling would be less than significant, increases in substance abuse and similar outcomes would be less than significant, and would be further mitigated through the measures described in the Final EIS, Volume II, Section 5.7. The conclusions rendered in this Final EIS are based upon the analyses in Draft EIS Appendix A, and also Final EIS Appendix L, Responses A-6.10.

Property Values

As stated in section 4.7 of the Draft EIS, the construction of a casino resort may result in changes to local property values and housing values, which could impact local tax assessor rolls and local property tax revenues. Changes in appreciation rates of adjacent properties could also impact future property tax revenues. Changes in property value can be affected by number of factors, including the proximity of the casino to other properties in the vicinity, the mix of properties surrounding the casino, whether the casino stimulates additional development and whether or not the casino is located in an urban area. Impacts to surrounding commercial and industrial uses would probably be neutral to positive because a casino development would bring increased economic activity and because such a project may stimulate additional commercial development in the vicinity of the site. While the Strawberry Fields Site itself is zoned for agricultural uses, there are residences located near the site. However, as stated in Appendix A of the Draft EIS, there is no anticipated impact on residential home values because of the existing operation of the Win-River Casino in the larger market area, the location of the Strawberry Fields Site near Interstate 5 and other commercial areas. Consequently, it is reasonable to conclude that the development of Alternative A would have a less-than-significant impact on surrounding housing property values (Draft EIS Section 4.7, Appendix A and Appendix L**)**.

Crime and the Provision of Law Enforcement, Fire and EMS

As discussed in Draft EIS Section 4.7, Alternative A would result in an increased number of patrons and employees traveling/commuting into the area on a daily basis. As a result, under Alternative A, criminal incidents would likely increase in the vicinity of the Strawberry Fields Site, as would be expected with any type of large commercial development. As described in both Draft EIS Section 4.7.1, the level of criminal incidents that occur at casinos and other gaming venues are similar to those of other commercial venues. The number of people traveling to the existing Win-River Casino would decrease substantially under Alternative A, and thus the rate of criminal incidents in the vicinity of the existing Win-River Casino Site would be expected to experience a corresponding decline. On a net basis, the increase in customers under Alternative A is expected to increase the number of service calls to local law enforcement by 169 calls per year, an increase of approximately 52% above calls for service at the existing casino. This information, as well as the causes and effects of crime and criminal behavior, are further analyzed in the recent report from Pro Forma Advisors, located at Final EIS Appendix L, Responses A-6.03 and A-6.10.

Potential impacts to law enforcement, fire, and Emergency Medical Services (EMS) were addressed in Section 4.10 of the Draft EIS. Fiscal costs of a potential increase in calls for service during operation of

Alternative A at the Strawberry Fields Site would be offset by increases in local governmental revenues (Final EIS, Volume II, Appendix L), payments to the Impact Mitigation Fund under the Compact (see Final EIS Section 1.5.1), and payments from the Tribe to the County under the Intergovernmental Agreement (IGA; see Final EIS Section 1.5.4 and Appendix R).

Some commenters noted a discrepancy in the number of documented calls for law enforcement services at the existing casino. The Tribe suggested that this discrepancy could be the result of the definition of what constitutes a call for service (CFS). For example, as described in Comments A6-03 and A6-14, there were approximately 1,351 law enforcement incidents at the Win-River Casino during a period from January 1, 2017 to October 10, 2018. According to the Tribe, this level of CFS is higher than previous trends reported by the Tribe, likely because it appears to also encompass incidents occurring offsite, but where the suspect was identified and/or reported by Redding security officials to located within the Win-River property. Regardless, to provide a conservative estimate of impacts, the data provided in Comments A6-03 and A6-14 related to CFS and crimes was factored into the recent Pro Forma Advisors estimate of fiscal effects from Alternative A. This analysis is included as Final EIS Appendix L. Subsequent to the publication of the Draft EIS, the Tribe and the County entered into an IGA that includes stipulations regarding payments to the County for the provision of law enforcement and fire/emergency service (see Final EIS Section 1.5.4 and Appendix R). Additionally, if the existing County IGA is terminated and a new agreement cannot be reached, Tribe has agreed to commit to a separate option to fund police, fire and EMS services. Specifically, under this "Option 2", the Tribe would fund the construction and operation of a Public Safety Building on the Strawberry Fields Site. The Public Safety Building would be comprised of a police substation and fire and emergency services personnel. Services provided by either the County or the option of the Public Safety Building, combined with on-site security measures, and the mitigation and BMPs described in Final EIS Sections 2.3.2 and 5.10, would reduce impacts to law enforcement, fire, and EMS. Fiscal impacts from the provision of law enforcement services, fire, and EMS were addressed in Draft EIS Sections 4.7 and 4.10. This analysis has been further refined in the Final EIS, Volume II, Sections 4.7 and 4.10 and Appendix L, as described below in **General Response 3.6.4**.

3.6.4 FISCAL EFFECTS

Summary of Comments: Several comments state that the socioeconomic analysis in the Draft EIS was incomplete in that it did not thoroughly analyze the net fiscal effects to local governments, including the County. Other comments state that transient occupancy taxes that would occur if Alternative A was developed in fee, should be considered an impact.

Response: Appendix A of the Draft EIS addresses fiscal effects under "Option 1", which assumes that law enforcement, fire and emergency medical services are provided by some combination of the City, County and CalFIRE. Specifically, fiscal effects are analyzed beginning on page 55 of that report, which was prepared by Pro Forma Advisors. Subsequent to the preparation of the Draft EIS, Pro Forma Advisors further refined its fiscal analysis, which is included in Final EIS Appendix L. Section 4.7.1 of the Final EIS was updated to clarify the distinction between "direct" versus "indirect and induced" fiscal effects. Final EIS Section 4.7.1 was also supplemented with more detailed analysis of the direct fiscal impacts regarding the provision of police, fire, and emergency services. A quantitative summary of net

fiscal impacts is contained in Final EIS Appendix L and summarized in Final EIS Table 4.7-5a and 4.7-5b.

The law enforcement and fire/EMS direct costs described above assumes that the Public Safety Building described in **General Response 3.6.3** would not be constructed. Because the operation of the Public Safety Building (Option 2) would address the issue of law enforcement, fire, and EMS under Alternatives A through C, and because the need for police, fire and EMS would decline at the existing Win-River Site once it ceases gaming operations, net fiscal effects under the Public Safety Building Option 2 would likely be either less-than-significant or net positive. Mitigation measures in Final EIS Section 5.10 have been revised to indicate that if the existing County IGA is terminated and a new agreement cannot be reached,, then the Tribe shall implement Public Safety Option 2 to construct and staff the proposed Public Safety Building to provide police, fire and emergency medical response services to the Strawberry Fields Site.

Regarding the specific effect of property taxes under either Option 1 or Option 2, the fiscal effects of removing lands from property tax rolls was specifically analyzed in Draft EIS Section 4.7, and has been further updated in Final EIS Sections 1.5.4, 4.7, 4.10 and **Appendix L**.

As noted by one commenter, one of the purposes of a transient occupancy tax is to compensate the County for services provided to visitors to the area. It is acknowledged that the County may provide public services related to the operation of the hotel and that in the absence of tax revenue, impacts associated with public services may occur; these effects are addressed in **General Response 3.6.3** and Final EIS, Volume II, Sections 1.5.4, 4.7, and 4.10. As discussed therein, fiscal costs of a potential increase in calls for service during operation of a hotel at the Strawberry Fields Site would be offset by increases in local governmental revenues (Final EIS, Volume II, **Appendix L**), payments to the Impact Mitigation Fund under the Compact (see Final EIS, Volume II, Section 1.5.1), and payments from the Tribe to the County under the Intergovernmental Agreement (IGA; see Final EIS, Volume II, Section 1.5.4 and **Appendix R**). Further, as part of the IGA between the Tribe and the County, the Tribe has agreed to levy a tribal transient occupancy tax following the opening of a hotel at the Strawberry Fields Site in the same manner and at the same rate as the County transient occupancy tax. The Tribe shall collect and deposit proceeds from the tribal transient occupancy tax in a tribal tax fund.

3.7 PUBLIC SERVICES

3.7.1 LAW ENFORCEMENT, FIRE, AND EMS

Summary of Comments: Numerous comments were received regarding a concern for adequate law enforcement, fire and emergency medical response (EMS) and the adequacy of funding related thereto.

Response: See **General Responses 3.6.3** and **3.6.4.** Subsequent to the publication of the Draft EIS, the Tribe and the County entered into an IGA that includes stipulations regarding payments to the County for the provision of law enforcement and fire/emergency service (see Final EIS, Volume II, Section 1.5.4 and Appendix R). The recuring payments for law enforcement services is in consideration of the Shasta County Sheriff's Office providing law enforcement services to the Strawberry Fields Site, and the

potential for related impacts to the District Attorney, Public Defender, and Probation. Additionally, Alternative A has been revised to include a new option for law enforcement and fire protection services (Option 2) that would include the construction and operation of a Public Safety Building within the Strawberry Fields Site. Under this option, law enforcement, fire and EMS services at the Strawberry Fields Site would be provided through this facility. A description of this option is provided in the Final EIS, Volume II, Section 2.3.2, and the Final EIS, Volume II, Section 4.10 has been revised to include an analysis of this alternative. Mitigation measures in the Final EIS, Volume II, Section 5.10 have been revised to indicate that if the existing County IGA is terminated and a new agreement cannot be reached under Public Safety Option 1, then the Tribe shall implement Public Safety Option 2 to construct and staff a Public Safety Building that will provide police, fire and emergency medical response services to the Strawberry Fields Site.

3.7.2 UTILITIES

Summary of Comments: Some comments were received regarding utility providers and utility infrastructure.

Response:

Electricity and Natural Gas

As stated in Section 4.10 of the Draft EIS, electrical service is not currently available at the Strawberry Fields Site. Electrical service to the Strawberry Fields Site would be provided by Redding Rancheria Utility Corporation (RRUCO), which currently receives electricity for the Win-River Casino via a contract with Redding Electric Utility (REU), as described in Draft EIS Section 2.3. It is anticipated that RRUCO would obtain electricity for the Strawberry Fields Site pursuant to a contract with either REU or Pacific Gas and Electric Company (PG&E). Final EIS Sections 2.0, 3.10, 4.10, and 4.14 have been updated to include the option of obtaining electricity from PG&E. As stated in Draft EIS Section 4.10, the expected utility demand load for the proposed project is 2,840 kilovolt amperes (KVA) with a probable annual electrical consumption of 15,465,000 kilowatt hours (kWh) per year. A description of existing facilities and possible improvements are included in Final EIS Section 4.14.2.

Natural gas service is not currently available at the site. As described in Section 3.10.6 of the Draft EIS, the Tribe would contract with PG&E to extend natural gas service to the Strawberry Fields Site. A PG&E natural gas mainline pipeline exists approximately 1,100 feet north of the Strawberry Fields Site at the southern edge of the Hilton Garden Inn parking lot. A description of existing facilities and possible improvements are included in Draft EIS Section 4.14.2.

Water Supply

The projected average daily potable water demand for the development of the Strawberry Fields Site would be approximately 210,400 gallons per day (gpd) with maximum weekend demand estimated at 315,000 gpd and an average daily landscape irrigation demand of approximately 10,919 gpd; see Appendix B of the Draft EIS. Two water supply options were described in Section 2.3.2 of the Draft EIS.

Under Water Supply Option 1, the City of Redding's (City's) water supply system would be extended to the Strawberry Fields Site to serve Alternative A. Connecting the City's water system would require construction of approximately 777 linear feet of piping from the casino to the connection point at the intersection of Bechelli Lane and the driveway leading west to 5170 Bechelli Lane. At this location, the new pipeline would connect to the City's existing 24-inch water line. The City's water system would also provide required fire protection flows. There is sufficient capacity in the transmission line to serve Alternative A Water Supply Option 1; see Appendix B of the Draft EIS. Due to the current magnitude of the surplus within the City's water supply and due to the relatively small amount of demand that Water Supply Option 1 would add compared to the existing baseline, Alternative A Water Supply Option 1 would not require the City to substantively alter their current surface water diversion practices or seek an additional surface water source.

Additionally, the City's Foothill Water Treatment Plant (WTP) has a treatment capacity of 24 million gallons per day (MGD) with expansion possibilities of up to 42 MGD and the Buckeye WTP has a capacity of 14 MGD (City of Redding, 2017e). The WTPs have sufficient capacity and Alternative A Water Supply Option 1 would not require the City to substantively alter their treatment facilities. Thus, Alternative A would not have a significant impact on the City's water supply system, and no mitigation is necessary. Mitigation measures related to cumulative impacts associated with water supply services were provided in Section 5.10.1 of the Draft EIS to further reduce potential effects by requiring the Tribe to enter into a service agreement with the City for connection and monthly service charges consistent with rates paid by other commercial users within the City.

Under Water Supply Option 2, water for domestic use, emergency supply, and fire protection would be provided by groundwater wells on the Strawberry Fields Site. Recycled water from on-site wastewater treatment would be reused for indoor non-potable uses (such as toilet flushing) and for landscape irrigation. Water Supply Option 2 involves no connections from the Strawberry Fields Site to the municipal water supply system or any off-site water supply infrastructure. Therefore, Water Supply Option 2 will have no impact on the City's water supply services and no mitigation measures are necessary. Potential impacts to groundwater and water resources from the construction and use of groundwater wells are discussed in Section 4.3 of the Draft EIS.

Wastewater Service

The projected average daily wastewater flow for Alternative A would be approximately 200,300 gpd with peak weekend flows estimated at 289,600 gpd. See Table 33 in Appendix B of the Draft EIS for details. Two wastewater treatment and disposal options were described in Section 2.3.2 of the Draft EIS.

Under Wastewater Option 1, wastewater treatment would be provided by the City via a connection to the City's conveyance system and wastewater treatment plant (WWTP). Connection to the City's existing collection system would require the installation of a sewer lift station on the Strawberry Fields Site, and approximately 702 linear feet of sewer forcemain pipelines between the new on-site lift station located northwest of the casino and the existing City-operated Sunnyhill Lift Station, located at 5100 Bechelli Lane. From the Sunnyhill Lift Station, wastewater from Alternative A would be conveyed to the City's Clear Creek WWTP for treatment and disposal. A detailed description of the proposed wastewater

conveyance facilities and connection to the City's system is provided in Appendix B of the Draft EIS. Alternative A would have a less-than-significant impact on the City's sewer system and WWTP as there is sufficient capacity in the Sunnyhill Lift Station, conveyance pipelines, and Clear Creek WWTP to provide services for Alternative A. Additionally, mitigation measures related to cumulative impacts associated with wastewater treatment services were provided in Section 5.10.1 of the Draft EIS that would further reduce potential effects by requiring the Tribe to enter into a service agreement with the City. Environmental impacts of the construction of off-site pipelines were analyzed in Section 4.14.

Under Wastewater Option 2, wastewater would be treated by an on-site WWTP, located immediately south of the casino and hotel structures; see Figure 2-8.1 of the Final EIS. Tertiary treated reclaimed water from the on-site WWTP would be utilized for casino toilet flushing and landscape irrigation. Wastewater Option 2 involves no connections of the Strawberry Fields Site to the municipal wastewater system and will have no impact on the City's wastewater services; therefore, mitigation measures are not necessary. Potential impacts to groundwater resources from operation of the on-site WWTP and leachfield under Wastewater Option 2 were discussed in Section 4.3 of the Draft EIS.

3.8 LAND USE

3.8.1 CONSISTENCY WITH LOCAL ZONING CODES

Summary of Comments: A number of commenters indicated that the Proposed Project was not in compliance with various codes adopted by local jurisdictions, including the compliance with the County's or City's general plans. Commenters stated that the Strawberry Field site is zoned for residential use. Some comments opined the construction of a casino as an unapproved land use.

Response: As indicated in section 3.9.2 of the Draft EIS, the Strawberry Fields Site is located outside the incorporated boundaries of the City as well as its primary and secondary growth areas, in addition to being located outside City's Sphere of Influence. However, as described in **Comment A4-03**, the Strawberry Fields Site is located within the City's General Plan Area. The Strawberry Fields Site is identified in both the Shasta County (County) and the City's General Plan. Consequently, Section 4.9 of the Final EIS has been revised to incorporate the City of Redding's (City) 2000-2020 General Plan-Use.

As discussed in Section 3.9 of the Draft EIS, local land use policies do not apply to lands taken into federal trust and, therefore, the project is not subject to state or local land use regulations. The Tribe and BIA have jurisdictional authority over land use matters on the federal trust lands held on the Tribe's behalf. The Tribal Council desires to work cooperatively with local and state authorities on land use matters.

As stated in Section 4.9.1 of the Draft EIS, although the proposed uses on the Strawberry Fields Site are not consistent with allowable uses under existing zoning, they are compatible with surrounding land uses along the Interstate 5 (I-5) corridor. Therefore, this inconsistency with existing zoning would not result in significant adverse land use effects.

3.8.2 USE OF AGRICULTURAL LAND

Summary of Comments: Several comments state that the Strawberry Field site is located on prime farmland, or prime agricultural land. Some comments are concerned that Alternative A will cause the loss of agricultural land, which in turn risks changing the rural nature of Shasta County.

Response: As indicated in section 4.9.1 of the Draft EIS, the majority of the Strawberry Fields Site is zoned by the County as Limited Agriculture (A-1), with a small sliver adjacent to the Sacramento River zoned as Designated Floodway (F-1). However, as described below in **General Response 3.11**, no substantial development would occur in the F-1 zoned area. The Strawberry Fields Site is not actively cultivated for crops, however, it is utilized by the Tribe for seasonal cattle grazing. As stated in Section 3.9.3 of the Draft EIS, the Strawberry Fields Sited does not contain any Farmland Mapping and Monitoring Program (FMMP) designated prime farmland, unique farmland, or farmland of local importance. The site received a Farmland Conversion Impact Rating (FCIR) score of 95, which is under the 160-point threshold for evaluation of alternative sites (Appendix J of the Draft EIS). As stated in Section 3.9.3 of the Draft EIS, there are 2,462,080 acres of farmland in Shasta County. Alternative A, which would convert 37 acres of grazing land to commercial use, would result in a conversion of less than 0.002 percent of the farmland in the County. This represents a negligible conversion of farmland, and would be a less-than-significant impact.

3.9 WATER RESOURCES

Summary of Comments: Multiple comments were received concerning potential impacts to water supply from groundwater pumping, and bank stabilization of the Sacramento River.

Response:

Groundwater Pumping

As stated in the Draft EIS, section 4.3, there are two water supply options for Alternative A: off-site water supply and on-site water supply. Both options are described in more detail in Appendix B of the Draft EIS and were determined to have less-than-significant impacts on surface water supply and regional groundwater levels.

As described in Final EIS Appendix M, Section 4.2.1 the optional on-site groundwater well at either the Strawberry Fields or Anderson site would draw on the Redding Groundwater Basin, which is not in overdraft. Based on well completion reports from local wells, the depth to groundwater aquifer ranges from approximately 20-to 300-feet below ground surface. It is assumed that a well drilled 300-to 600-feet deep should produce enough water quantity and quality to supply the proposed development. A well drawing from a deeper confined aquifer should not affect the shallower local residential wells due to confining geologic layers which act as a barrier between the upper and lower water bearing strata. Accordingly, use of groundwater to provide the water supply of Alternatives A through E does not have the potential to significantly impact groundwater levels or surface water levels and aquatic habitat within the Sacramento River.

The Strawberry Fields and Anderson sites are within the Anderson and Enterprise Subbasins and currently under the jurisdiction of the Enterprise Anderson Groundwater Sustainability Agency (EAGSA). If a site is taken into trust, the land will no longer be within the jurisdiction of the EAGSA and will not be subject to the groundwater sustainability plans that were released in January 2022. The Enterprise Subbasin Groundwater Sustainability Plan[4] states the following regarding the sustainable yield of the Enterprise Subbasin:

> *Projections for the historical, current, and projected periods all indicate that undesirable results are unlikely. An additional projection simulation, which incorporates future water demands beyond those that are reasonably anticipated due to population growth and climate change, was performed to aid in estimating a sustainable yield. The average projected groundwater pumping in the Enterprise Subbasin under this increased water demand projection is 75 [thousand acre-feet per year] TAFY, as compared to an estimate of 30 TAFY of groundwater pumping needed to accommodate anticipated population growth and current climate change models. Based on the locally defined SMC, this extreme pumping condition is not projected to produce undesirable results in the subbasin. As such, the sustainable yield for the Enterprise Subbasin is estimated to be at least 75 TAFY."*

Based on the findings of the Enterprise Subbasin Groundwater Sustainability Plan, the findings of the Draft EIS remain accurate, and the Proposed Project would have a less-than-significant impact on regional groundwater levels. Final EIS Sections 3.3 and 4.3 have been updated to include information from the January 2022 Enterprise Subbasin Groundwater Sustainability Plan and January 2022 Anderson Subbasin Groundwater Sustainability Plan.

Water conservation has been incorporated into the design of Alternatives A – D. Under the on-site wastewater treatment and disposal option, reclaimed water from the on-site WWTP would be utilized for casino toilet flushing and landscape irrigation.

Sacramento River Streambank Stabilization and Vegetative Buffer

Final EIS, Volume II, Section 2.0 has been updated to include a revised description of the stream stabilization and vegetative buffering, inclusive of a 150-foot setback from the Sacramento River and vegetative buffering. As a result, the streambank stabilization and vegetative buffering is now 150 feet across and thus is substantially wider than the streambank stabilization and buffering described in the Draft EIS. Figure 2-8.2 has been added to Final EIS Section 2.0 to depict the cross section of these measures. Please also see **General Response 3.11** below for further information and Final EIS Section 4.3 for impacts on water and Section 4.5 for impacts to biological resources.

3.10 WASTEWATER

Summary of Comments: Several comments were received concerning potential impacts to wastewater management and implementation of the proposed leach field under Wastewater Option 2 at the

[4] Enterprise Anderson Groundwater Sustainability Agency, 2022. Enterprise Subbasin Groundwater Sustainability Plan. Dated January 2022. Available online at https://eagsa-redding.hub.arcgis.com/.

Strawberry Fields Site (i.e., Alternatives A through D). Some commenters opined that wastewater treatment onsite would or could be detrimental to wildlife and water quality in the Sacramento River.

Response: Potential impacts to water quality, and specifically related to wastewater that would flow to the project leach field under Option 2, On-site Treatment and Disposal, were analyzed in Draft EIS Section 4.3 and in the Water and Wastewater Feasibility Study (Draft EIS Appendix B). As described in Final EIS Section 4.3, wastewater under Option 2 would be treated to a tertiary level and "discharged into a leach field complex located south of the casino and hotel on the Strawberry Fields Site. The Strawberry Fields Site could accommodate a leach field area as large as 48 acres. A leach field complex of approximately 33 acres would accommodate a rate of flow equal to double the projected average daily flow to avoid impacts associated with a failure of all or portions of the leach field; a 20 percent contingency has also been factored into the sizing of the leach field to avoid oversaturation of the soil and to account for prolonged periods of peak hourly flow." Commenters are correct that proper utilization of the leach field is contingent upon the affected soils evidencing sufficient absorption properties. Subsequent to the publication of the Draft EIS, an Updated Water and Wastewater Feasibility Study (Final EIS Appendix M) was prepared. Among other things, the updated study included the results of percolation tests at the Strawberry Fields Site. The tests were performed using the method described in Shasta County Onsite Wastewater Treatment System Technical Guidance Manual. The percolation tests conclude that only two of the fifteen test locations fall outside the standard range for "usable disposal material" according to the Underground Injection Control (UIC) Program. Furthermore, Shasta County's LAMP for OWTS specifies a minimum depth to groundwater based on percolation rates. Based on the demonstrated percolation results, the required minimum depth to groundwater is 5 feet. As provided by test pit logs, the average depth to groundwater is more than 12 feet, which complies with Shasta County Standards. (Final EIS Appendix M, including its appendices). The sizing of the proposed leach field area accounts for the site exploration results and is designed to comply with Shasta County standards for leach field design. As described in Section 5.2.2 Final EIS and Appendix M, "A final design by a licensed engineer will be necessary to determine actual size and placement [of the leach field]." The disposal of wastewater on site via subsurface drainage would be regulated by the USEPA within the UIC program in compliance with the Safe Drinking Water Act (SDWA) to ensure the protection of groundwater quality.

3.11 FLOODING AND FLOODPLAIN

Summary of Comments: Multiple comments were received concerning potential impacts to flooding of the Strawberry Field Site. Some comments stated that the project does not adequately identify which facilities will be located within the floodplain. Several comments were received concerning flooding of the Sacramento River, runoff, and impacts on the streambank caused by construction activities. Other comments state that the location of the Alternative A improvements is too close to the banks of the Sacramento River, and thus the setback should be increased to a minimum of 150 feet from the top of bank to mitigate the risk of flooding. At least one comment stated that it was difficult to ascertain the distances of the Strawberry Fields setbacks described and illustrated in the Draft EIS. One comment stated that the Draft EIS does not comply with Executive Order 11988 Floodplain Management.

Response: As stated in Draft EIS Section 4.3.1, no significant flooding impacts would occur as a result of Alternative A. Mitigation measures such as consultation with FEMA and the United States Army Corps

of Engineers (USACE) and adherence to conditions of applicable permits related to streambank stabilization measures along the Sacramento River, if any, would further reduce potential impacts as a result of construction within the 500-year floodplains.

As described in Draft EIS Section 3.3, the east bank of the Sacramento River in the vicinity of the Strawberry Fields Site actively erodes during periods of very high flow. Streambank stabilization measures, described in detail in Section 2.3.2 and Appendix C of the Draft EIS would slow the rate of erosion and reduce sedimentation. Subsequent to the publication of the Draft EIS, an Updated Grading and Drainage was prepared, and this is included as Final EIS Appendix N. As described therein and in Final EIS Section 2.3.2, the streambank stabilization measures proposed in the Draft EIS have been modified to include a 150' setback from the top of bank, an emphasis on live native vegetation, and use of existing native materials in place of riprap/boulders. Figure 2-8.2 has been added to Final EIS Section 2.0 to depict the cross section of these measures and Figures 2-8.1, 2-10, 2-12, and 2-14 have been revised to show the 150-foot buffer from top of bank in relation to the proposed development and the area for vegetative streambank stabilization for Alternatives A, B, C, and D. Thus, vegetative streambank stabilization measures and 150-foot setback would reduce erosion of the eastern bank of the Sacramento River during periods of high-water flow, and not only during flooding events. Mitigation Measures identified in Draft EIS Section 5.5.3 would further minimize or avoid potential impacts to wetlands and Waters of the U.S.

A 150-foot setback from top of bank for project improvements (with the exception of streambank stabilization) was determined to be sufficient for several reasons. First, there are no federal setback requirements and the City of Redding's setback requirements are 100 feet from the Sacramento River and 75 feet from riparian vegetation. Therefore, although local setbacks do not apply to the Proposed Project, given Federal jurisdiction for land in trust, the 150-foot setback from top of bank is generally consistent with the local setback requirements. A description of the local setback requirements and their applicability to Federal trust lands is provided in the updated Final EIS, Volume II, Section 3.3. Second, although some of the Strawberry Field's Site does lie within the 100-year floodplain, with the exception of the riverbank stabilization and wet pond improvements, none of the improvements would occur within the 100-year floodplain. Third, as described in Draft EIS Section 2.3.2, the risk of flooding to project improvements would be further reduced because much of the land on which the improvements will be sited on will be elevated approximately 3 feet above the 100-year floodplain. Finally, the 150-foot setback from top of bank meets the minimum recommendations provided by the USEPA, which recommended against a setback less than 150 feet from the top of bank (see **Comment A5-03**). For these reasons, the risks of flooding at the Strawberry Fields Site and potential water quality issues associated with potential flooding would not increase as a result of the Proposed Project.

Although previous hydraulic modeling of Churn Creek in the 100-year Churn Creek flood event identified a potential for Churn Creek to overtop I-5 and cause shallow overflow across the Strawberry Fields Site (see Draft EIS Section 2.3.2), Caltrans has no record of I-5 overtopping in this area in the 50 years of I-5's existence. As described in Section 4.1 of Appendix N, this lack of observed overtopping of I-5 during known extreme flooding of Churn Creek is likely due to the elevation of the agricultural field and Smith Road compared to I-5. It is more likely that the bulk of the estimated 700 cfs spill-over actually flows south to Smith Road and beyond – well away from the Strawberry Fields Site. Regardless of the lack of

actual occurrences of this phenomenon, the proposed vegetated swale that would run along the easterly project boundary has been conservatively designed to provide emergency conveyance of possible storm water overflow from Churn Creek east of I-5.

Regarding Executive Order 11988 Floodplain Management (EO 11988), as discussed in Section 4.3.1 and Figures 2-8.1 and 3.3-1 of the Draft EIS, Alternative A was been designed to avoid development within the 100-year floodplain. With the exception of a infiltration wet pond proposed under Alternatives A – D and the installation of bank stabilization vegetation along the Sacramento River, the proposed development footprint of Alternative A, including all structures and infrastructure (including wastewater leach fields proposed under Wastewater Option 2), would be located entirely outside the FEMA designated 100-year floodplain. The infiltration wet pond has not been designed to mitigate storm water quantity of runoff, but is rather an infiltration wet pond used to attenuate rare-event potential flood flows resulting from Churn Creek overtopping Interstate 5 and to improve storm water quality. The infiltration wet pond would be excavated from the upland portion of the floodplain and removing soil from the floodplain is not expected to adversely impact drainage patterns or increase flood risks. There is no proposal to place fill within the 100-year floodplain on the Strawberry Fields Site.

The majority of the Anderson Site is located within the 100-year floodplain of the Tormey Drain. However, for the reasons described in Draft EIS Section 4.3.5, Alternative E would be EO 11988 compliant provided that the "Letter of Map Revision – Fill" is filed with FEMA.

As described in Draft EIS Section 3.3.2 and Figure 3.3-3, most of the Alternative F Win-River Casino Site is located outside of the 100-year floodplain. The small northwestern portion of the Win-River Casino Site along Clear Creek is within the FEMA 100-year floodplain (Draft EIS Section 4.3.6). However, the proposed development footprint of Alternative F is located entirely outside the FEMA 100-year and 500-year floodplains. No associated structures, utility, wastewater treatment and disposal systems, or storage areas are proposed for development within the 100-year and 500-year floodplains on the site. No significant flooding impacts would occur as a result of Alternative F, and no development is proposed within the floodplain. Therefore, Alternative F is in compliance with EO 11988.

3.12 BIOLOGY

3.12.1 SPECIAL-STATUS SPECIES

Summary of Comments: A majority of the biological comments received express a concern for potential impacts to special-status species such as bald eagles, salmon, and steelhead.

Response: Biological resource surveys and focused botanical surveys of the Strawberry Fields Site were conducted on April 25, 2007, May 3, 2007, May 9, 2007, June 27, 2007, May 16, 2016, March 13, 2017, and May 21, 2019. Analysis was performed to determine which special-status species have the potential to occur within the Strawberry Fields Site. Habitat requirements for each species were assessed and compared to the type and quality of habitats observed during the biological surveys.
Several regionally occurring species were eliminated due to a lack of suitable habitat, elevation range, lack of suitable substrate/soils, and/or geographic distribution.

As discussed in Section 3.5.2 of the Draft EIS, the Strawberry Fields Site may provide habitat for seven federally-listed or protected species including bald eagles, Chinook salmon and Steelhead. Potential adverse effects to species would be avoided or minimized to less-than-significant levels with implementation of the mitigation measures identified in Section 5.5.1, 5.5.2, and 5.5.3 of the Draft EIS, which include preconstruction surveys, avoidance buffers, and silt fencing. Therefore, impacts to special-status species would be mitigated to less-than-significant levels. On February 20, 2020, the USFWS concurred with the Biological Assessment that the project may affect but is not likely to adversely affect federally listed species, and no further consultation is needed. The National Marine Fisheries Service (NMFS) also issued a concurrence letter on May 7, 2019 concluding the same regarding federally listed aquatic species. All consultation correspondence is included in the Final EIS Appendix O.

3.12.2 POTENTIAL EFFECTS TO HABITATS

Summary of Comments: Multiple comments were received concerning potential impacts to biological resources such as loss of habitat for bald eagles and bank swallows. Many commenters were concerned about project impacts on salmon and steelhead habitat. Other comments inquired about the impacts of streambank armoring and the leach field location on the Sacramento River.

Response: As stated in the Final EIS, approximately 36 acres of non-native annual grassland would be directly impacted by the development of a casino-resort, retail facilities, parking areas, and related infrastructure under Alternative A. An additional 36 acres consisting of non-native annual grassland and small areas of valley foothill riparian and valley oak woodland habitat would be impacted by the development of water supply and wastewater facilities if Option 2 for both Water Supply / Wastewater and Public Safety is implemented. The remaining habitat on the site (196 acres under Option 1 for Water Supply and Wastewater and 160 acres under Option 2 for both Water Supply / Wastewater and Public Safety) would be avoided through project design and remain as undeveloped open space.

Although the grassland habitat and valley foothill riverine habitats within the Strawberry Fields site may be suitable for several federal and state special-status species, they are not, in and of themselves, listed as critical or sensitive under federal designation. Wildlife movement would not be significantly restricted, as the majority of the Strawberry Fields Site would remain undeveloped.

As described in Section 2.3.2 Alternative A Project Components, the proposed leach field under "On-site Treatment and Disposal (Option 2)" would be approximately 33 acres, located in the southeast of the Strawberry Fields site (Figure 2-8.1). The leach field would remain as open space for wildlife. Impacts from this proposed option would be less than significant and no mitigation is required (Section 4.3.1 of the Draft EIS).

As identified in Section 3.5 of the Draft EIS, the USFWS designated critical habitat for steelhead (Northern California Distinct Population Segment) and Chinook salmon (Central Valley Spring-Run and Winter-Run) occurs in the Sacramento River adjacent to the Strawberry Fields site and in the riverine habitat on site (USFWS, 2017b). Segments of the Sacramento River are designated as essential fish habitat (EFH) for Chinook salmon and are protected under the Magnuson-Stevens Fishery Conservation

and Management Act (MSMA). Designated critical habitat and EFH does not occur within the area of impact, and adjacent critical habitat and EFH would not be impacted.

As part of the Proposed Project, the upper loam portion of the riverbank would be stabilized through the implementation of a vegetative buffer (see General Response 3.11). Construction of the Proposed Project, including streambank stabilization, was evaluated for potential impacts to listed fish species and critical habitat in consultation with the National Marine Fisheries Service (NMFS) (Draft EIS Appendix D**)**. NMFS reviewed the project under ESA Section 7(a)(2) and MSMA in a concurrence letter (May 7, 2019) and determined the proposed actions were not likely to affect listed fish species with the inclusion of mitigation measures listed in Draft EIS Appendix D. Furthermore, a Stormwater Pollution Prevention Plan (SWPPP) and Best Management Practices (BMPs) would be implemented to further reduce potential runoff impacts to critical habitat (Section 5.2 of the Final EIS). Therefore, impacts to aquatic wildlife habitat resulting from development of the Casino are less than significant and no mitigation is required.

Regarding potential effects to bird species, refer to Mitigation Measures **5.5.1**, **5.5.2**, and **5.5.3**, which include preconstruction surveys, avoidance buffers, and silt fencing for special-status species. Mitigation Measure **5.5.2 (P)** has been revised to clarify that should nesting migratory birds, including bank swallow, be observed in the area of impact, consultation with the USFWS would occur to confirm the appropriate course of action. As described in **General Response 3.9** and **3.11**, the streambank stabilization measures proposed in the Draft EIS have been modified to include a 150' setback from the top of bank, an emphasis on live native vegetation, and use of existing native materials in place of riprap/boulders. Alternative A has been revised to provide a 150-foot setback from the top of the bank of the Sacramento River. The proposed streambank stabilization would not disturb the existing vertical loam bank and would include establishing riparian trees in the setback area between the existing riverbank and the hardscape features of the development. This would stabilize and reduce the meander potential within the mantle of loamy soil while preserving the existing cut bank and natural river processes as described in Bank Swallow Conservation Strategy for the Sacramento River Watershed, California Bank Swallow Technical Advisory Committee, June 2013. Additionally, the proposed streambank stabilization will extend approximately 1,000 feet from the northern boundary of the project area, leaving approximately 4,300 feet (more than 76 percent) of potential bank swallow habitat on the project site undisturbed. As described in Draft EIS Section 4.5, suitable nesting habitat for bald eagle is absent on the Strawberry Fields Site, although potential foraging areas occur throughout the site.

3.13 AESTHETICS

3.13.1 VIEWPOINTS

Summary of Comments: A number of comments were received concerning the aesthetics of the project alternatives and how such alternatives would appear from the perspective of persons in the vicinity (i.e., viewpoints). Commenters also expressed concern regarding how development of the Strawberry Field Site would affect the views of the "gateway" to the City of Redding.

Response: As stated in section 4.13.1 of the Draft EIS, the Proposed Project would change the existing views of the northern portion of the Strawberry Fields Site from open fields to a casino, resort and retail

complex. However, the central and southern portions of the site would remain as undeveloped open space. The Proposed Project would not be out of character with typical roadside development adjacent to I-5 (such as large commercial developments, including the Mt. Shasta Mall, located along I-5 within the City of Redding), nor would it impede views of scenic resources (with the obvious exception of persons working at or visiting the resort). Additionally, Alternative A would not result in the removal of any mature trees and the majority of the site (approximately 80 percent), would remain relatively undeveloped. For example, the leach field proposed under Wastewater Option 2 would not be visible. By clustering the Proposed Project in the north portion of the Strawberry Fields Site, which is closer to existing commercial development within the City, the visual effects of the Proposed Project would be mitigated. For these reasons, and those stated within Draft EIS Section 4.13, Alternative A would have a less-than-significant aesthetic impact.

Individual viewpoints were also analyzed in Draft EIS Section 4.13.1. Specifically, viewpoints A through E were further examined in section 4.13.1 of the Draft EIS and were determined to have less-than-significant impacts. Additionally, as stated in section 4.13.1 of the Draft EIS, the architectural design of the project would be enhanced by landscaping through the use of drought tolerant plants native to the region. This includes the incorporation of landscape amenities to complement buildings and parking areas by means of setbacks, raised landscaped berms and plantings of trees and shrubs. Screening features and natural elements will be integrated into the landscaping design of the project to impede the view of the facilities from directly adjacent existing residences and enhance the overall appearance of the casino.

Regarding the heights of the various Alternative A structures, please see the updated Final EIS Section 2.3.2, which now lists the heights of the various building components.

Regarding viewpoints from persons on the Sacramento River, note that these are depicted in Figures 4.13-4 and 4.13-5 of Draft EIS Section 4.13.1. Figure 4.13-4 depicts the viewshed experienced by residences bordering the western bank of the Sacramento River (Viewpoint D). Figure 4.13-5 depicts the viewshed experienced by the motorists traveling along South Bonnyview Road, north of the Strawberry Fields Site (Viewpoint E). Both of these viewpoints are at or above the banks of the Sacramento River. Thus, improvements feature more prominently in these viewpoints than would be the case from the perspective of a person at river level, such as someone in a boat. As described in Draft EIS Section 4.13.1, less-than-significant impacts would occur for Alternative A from these viewpoints.

Final EIS Section 4.13 has been updated to include two new perspectives, one from Viewpoint F (Figure 4.13-6) and a second from Viewpoint G (Figure 4.13-7). Viewpoints F and G were included to specifically illustrate the perspective of someone in a boat on the Sacramento River. As stated in Final EIS Section 4.13.1, a less-than-significant impact would also occur from Viewpoints F and G.

Please see **General Response 3.4** for more information on project design.

3.13.2 LIGHTING AND GLARE

Summary of Comments: Some comments stated concerns of general lighting and glare associated with the construction and operation of the project alternatives.

Response: Potential effects associated with lighting and glare were analyzed in Section 4.13.1 of the Draft EIS. Design features included in Section 2.0 of the Draft EIS would further reduce aesthetic impacts from implementation of the project alternatives. For example, Alternative A components are described in Draft EIS Section 2.3.2 under "Architecture, Signage, Lighting, and Landscaping," detailing the type of glass and lighting to be used. Draft EIS Section 4.13.1 addresses impacts from light and glare. The exterior lighting of the project would be designed in accordance with Unified Facilities Criteria (UFC) 3-530-01, so as not to cast light or glare off site. Such design features would include the use of pole-mounted lights with downcast illumination and the utilization of shielding. Additionally, no strobe lights, spot lights, or flood lights would be used and shielding will be used in accordance with (UFC) 3-530-01. All exterior glass would be non-reflective low-glare glass. All project designs were evaluated in consultation with the USFWS and NMFS (Draft EIS Appendix D and Final EIS Appendix O-1**)**. As described in the Draft EIS, project activities were determined to be unlikely to affect wildlife (including listed fish species), with the inclusion of the design features described above. Therefore, no significant impacts associated with lighting or glare would occur.

3.13.3 LIGHT POLLUTION

Summary of Comments: A number of comments emphasized a concern for light pollution caused by the casino.

Response: The International Dark-Sky Association's (IDA) Model Lighting Ordinance describes light pollution as an inappropriate or excessive use of artificial light[5]. The IDA identifies glare, skyglow, clutter, and light trespass as the primary components of light pollution. Glare is defined as "excessive brightness that causes visual discomfort". Skyglow refers to "brightening of the night sky over inhabited areas". Clutter is regarded as "bright, confusing, and excessive groupings of light sources". Light trespass describes the light falling in unintended or unnecessary areas. Sources of light pollution include exterior and interior building lighting, advertising, commercial properties, factories, offices, illuminated sporting venues, and streetlights

The Unified Facilities criteria (UFC) system provides planning, design, construction, sustainment, restoration, and modernization criteria for all Department of Defense projects and other agencies where appropriate[6]. Section 3-530-01 of the UFC provides guidance for the design of exterior and interior lighting systems including direct glare, surface luminance, and uniformity[7]. Design features described in

[5] Source: International Dark Sky Association (IDA). Light Pollution. Available electronically at: https://www.darksky.org/light-pollution/. Accessed July 29, 2019.
[6] Source: Whole Building Design Guide (WBDG). May 29, 2002. Unified Facilities Criteria. Available electronically at: https://www.wbdg.org/ffc/dod/unified-facilities-criteria-ufc. Accessed on July 29, 2019.
[7] Source: Department of Defense (DOD). December 10, 2010. Unified Facilities Criteria (UFC): Design: Interior, Exterior Lighting and Controls. UFC 3-530-01. This UFC was accessed on July 29, 2019 at: https://www.wbdg.org/ffc/dod/unified-facilities-criteria-ufc/ufc-3-530-01

Draft EIS Section 2.3.2 would reduce potential light pollution impacts to a less-than-significant level via IDA and UFC compliance.

3.13.4 ELECTRONIC SIGNAGE

Summary of Comments: A number of comments were received concerning the use of electronic signage at the proposed casino.

Response: Electronic signs are banned in the City of Redding[8]. However, as described in **General Response 3.8.1** and Section 3.9.2 of the Draft EIS, the Strawberry Fields Site is located outside the incorporated boundaries of the City as well as its primary and secondary growth areas, in addition to being located outside City's Sphere of Influence. However, as described in **Comment A4-03**, the Strawberry Fields Site is located within the City's General Plan Area. Shasta County's Zoning Code Sections 17.84.061 through 17.84.069 address the placement of signs[9]. As described in Section 17.84.064, electronic signs are typically prohibited, unless the content of such signs remains unchanged during a 24-hour period.

As described in **General Response 3.8.1** and Section 3.9 of the Draft EIS, local land use policies do not apply to lands taken into federal trust and, therefore, the project is not subject to state or local land use regulations. The Tribe and BIA have jurisdictional authority over land use matters on the federal trust lands held on the Tribe's behalf. The Tribal Council desires to work cooperatively with local and state authorities on land use matters and the BIA aims to comport with both city and county regulations where feasible. Although implementation of electronic signage would generally be consistent with Chapter 18.40.090, of the City of Redding's Zoning Ordinance for Lighting and with 18.42.030 for Sign Standards[10], it would not be compliance with the prohibition on electronic signs. Similarly, the project would generally comply with Shasta County's Zoning Code Sections 17.84.061 through 17.84.069 concerning signs[11], although it would not be compliance with the electronic sign prohibition. Project signage would be utilized to communicate messages to viewers, promote attractive appearances, promote commerce, promote identification of land uses without confusion or hazard, and promote free expression of the Tribe. This is consistent with subsections C through G of chapter 17.84.061 in the Shasta County Zoning Codes. No lighting shall be of the type or in a location such that constitutes a hazard to vehicular

[8] Source: City of Redding, 2018. August 21, 2018. Redding Zoning Ordinance, *D. Electronic Message Board Signs.* Available electronically at: https://www.cityofredding.org/home/showdocument?id=23061. Accessed on November 2019.

[9].Source: Shasta County, CA Code of Ordinances. Chapter 17.84 General Development Standards. Available online at: https://library.municode.com/ca/shasta_county/codes/code_of_ordinances?nodeId=CD_ORD_TIT17ZO_CH17.84GEDEST_17.84.061PUSIOR. Accessed on January 21, 2020.

[10] Source: City of Redding, Zoning Ordinance. Available online at: https://www.cityofredding.org/departments/development-services/planning/zoning-ordinance. Accessed on January 21, 2020.

[11].Source: Shasta County, CA Code of Ordinances. Chapter 17.84 General Development Standards. Available online at: https://library.municode.com/ca/shasta_county/codes/code_of_ordinances?nodeId=CD_ORD_TIT17ZO_CH17.84GEDEST_17.84.061PUSIOR. Accessed on January 21, 2020.

traffic, either on private property or on abutting streets"[12].

Finally, Section 2.0 of Volume II of the Final EIS has been updated to include a description of the proposed project signage, including placement, design elements and the height of the proposed signs, and Section 5.0 of Volume II of the Final EIS has been revised to include a mitigation measure to ensure that the placement of the electronic signage is designed so that it is not facing residential areas with direct line of site. Please see the Final EIS, Volume II, Section 2.0 and 5.0.

3.14 TRAFFIC

Summary of Comments: Several comments were received concerning potential impacts to traffic and circulation. Some comments state that the Proposed Project would have significant impacts on traffic. Other comments stated that existing traffic conditions are already unacceptable. For example, a number of traffic comments stated that the Proposed Project would worsen traffic congestion at interchange located at South Bonnyview Road and Interstate I-5. A number of comments stated that the Traffic Impact Study (TIS) included as Draft EIS Appendix F did not analyze traffic impacts during the peak rush hour, and thus the results from the TIS are unreliable.

Response: Traffic impacts were thoroughly analyzed in Draft EIS Sections 4.8, 4.14 and 4.15, as well as the traffic impact study (TIS) in Draft EIS Appendix F. Subsequent to the publication of the Draft EIS, the TIS was updated to include analyses of additional intersections and roadways, to consider the completion of recently constructed transportation improvements associated with the River Crossing Marketplace Specific Plan, and to consider additional reasonably foreseeable projects. The Updated TIS is included as Final EIS Appendix Q. As stated in these sections and reports, traffic impacts would be reduced to less than significant levels with the implementation of the measures described in Draft EIS Section 5.8, and as further updated in Final EIS Section 5.8. Impacts at the interchange located at South Bonnyview Road and Interstate I-5 were extensively analyzed in the Draft EIS and mitigation was proposed in Draft EIS Section 5.8.2. Mitigation includes funding for new improvements at this interchange. Since the time of preparation of the Draft EIS and original TIS, the River Crossing Marketplace Specific Plan Traffic Impact Analysis Report and certain related offsite mitigation improvements have been constructed, including improvements at the South Bonnyview Road / Bechelli Lane intersection. These improvements were identified by the City to mitigate the operational conditions of this intersection under cumulative conditions, including operation of Alternative A[13]. Therefore, previously recommended mitigation at the South Bonnyview Road / Bechelli Lane intersection is no longer required and has been removed from the Final EIS (see Final EIS Appendix Q for additional details).

[12] Source: Shasta County, CA Code of Ordinances. Chapter 17.84.050 Lighting. Available online at: https://library.municode.com/ca/shasta_county/codes/code_of_ordinances?nodeId=CD_ORD_TIT17ZO_CH17.84GEDEST_17.84.050LI. Accessed on January 21, 2020.

[13] *Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2017052030, River Crossing Marketplace Specific Plan*, Pages 4.12-43 through 4.12-49, PlaceWorks, December 2019.

Regarding the methodology employed by Kimley-Horn in Draft EIS Appendix F to analyze traffic impacts, patronage visits and thus traffic generated from casino projects tend to occur at times that are different from most commercial developments. Specifically, as described in Draft EIS Appendix F:

> "Based on existing traffic volume information and expected trip generation from the Project, it was determined that the Friday and Saturday evening peak periods represent the worst case periods to evaluate."

Thus, the TIS (Draft EIS Appendix F) and Updated TIS (Final EIS Appendix Q) estimated traffic impacts during these times. This is why the TIS and Updated TIS did not evaluate traffic impacts during weekday morning rush hour traffic. The methodology employed in the traffic impact studies is consistent with many traffic studies related to proposed gaming projects, and is discussed at length in the Updated TIS.

Please also see individual responses to comments, where specific traffic related comments are addressed.

3.15 NOISE

Summary of Comments: Several commenters were concerned that noise associated with the amphitheater would negatively impact nearby residents. Other commenters opined that the Sacramento River would intensify any sounds projected from the amphitheater. Multiple comments were received concerning operational noise impacts from the project due to increased traffic. Comments were also received regarding vibration from construction activities and operations.

Response: The proposed amphitheater has been removed from the project alternatives. Therefore, no significant noise impacts would occur in connection with the amphitheater.

As discussed in section 4.11.1 of the Draft EIS, traffic noise associated with operational uses of Alternative A were evaluated using the volume and speed of traffic as well as the number of trucks in the flow of traffic. Average vehicle speeds were not anticipated to change in the vicinity of the Strawberry Fields Site nor were the mix of trucks in the traffic flow expected to change during the operational phase. However, implementation of Alternative A would increase traffic volumes due to the addition of patron and employee vehicle trips. Baseline noise level measurements were collected along representative off-site roadways that would experience an increase in traffic as result of Alternative A. For a significant impact to occur, the traffic increase due to Alternative A would need to cause ambient noise levels to reach or exceed significance thresholds of 67.0 dBA Leq, or in areas where the threshold is already exceeded, cause a perceivable difference in the ambient noise environment at 3 dBA Leq or more. Both Site Access Options 1 and 2 were analyzed and results tabulated in Table 4.11-3 of the Draft EIS. As shown in Table 4.11-3, all study roadway segments for Alternative A are below the 67 dBA threshold, and therefore a significant impact would occur if the ambient noise levels were raised to 67 dBA Leq or higher. With operation of Alternative A, site access Option 2 would result in a change greater than 3.0 dBA Leq for Churn Creek Road (between Smith Road and Knighton Road) and for Smith Road (between Churn Creek road and Adra Way). This means an audible difference in the environment would be perceivable with the addition traffic. However, both Alternative A site access Option 1 and 2 ambient noise levels were not raised to 67.0 dBA Leq or greater. Even with the perceivable increases at Churn

Creek Road (between Smith Road and Knighton Road) and Smith Road (between Churn Creek road & Adra Way) under site access Option 2, the ambient noise levels would be 65.7 and 66.6 dBA Leq, respectively, and would therefore not exceed the 67 dBA Leq threshold. Hence, traffic-associated noise impacts were determined to be less than significant.

Vibration levels were analyzed extensively in Draft EIS Section 4.11 and most of these effects would relate to temporary construction activities. As stated therein, vibration would be reduced to less-than-significant levels with the implementation of BMPs described in Section 2.3.2.

3.16 AIR QUALITY AND CLIMATE CHANGE

Summary of Comments: Some comments were received concerning impacts associated with global climate change or global warming. One commenter opined that the increase of pavement on agricultural land would cause more heat to radiate and effects of the vehicles on the pavement would increase carbon levels.

Response: The Draft EIS Section 4.15 provided discussion and analysis of cumulative impacts relating to climate change. For example, as stated in Section 4.15 of the Draft EIS:

> "Climate change is a global issue that is not being caused by any single development project, but by global cumulative increases in atmospheric greenhouse gas (GHG) concentrations. Thus, global warming is most effectively addressed on a global or regional level. California's global warming policies and legislation (most notably Executive Order [EO] S-3-05 and AB 32) are intended to be regional approaches to ensure that statewide emissions are reduced substantially in the future (to levels much lower than existing levels)."

California continues to adopt new policies and legislation with the focus of addressing climate change at the state level, most recently issuing EO N-79-20 and adopting AB 1279. EO N-79-20 bans the sale of new gas-powered cars and trucks by 2035, and AB 1279, the California Climate Crisis Act, establishes the state policy of achieving net zero greenhouse gas emissions as soon as possible, but no later than 2045.

The Final EIS includes quantification of GHG emissions resulting from the project alternatives (in carbon dioxide equivalents [CO_2e]), an estimate of the social cost of GHG emissions (i.e., the monetary estimate of the economic impacts associated with emitting an additional ton of that GHG in a given year), and discussion of reduction measures to address comments received during scoping and from cooperating agencies. See Final EIS Sections 4.4 and 4.15 for these analyses. The federal government has enacted measures that would reduce GHG emissions from mobile sources, some of which have been accounted for in the air quality model used to estimate mobile emissions. BMPs were provided in Section 2.3.2 of the Draft EIS to reduce project-related GHG emissions. Construction BMPs include reduced idling of heavy equipment, thereby, reducing CO_2 during the construction or the Proposed Project. Operational BMPs would reduce indirect GHG emissions from electricity use, water and wastewater transport, and waste transport through the installation of energy efficient lighting, heating and cooling systems, low-

flow appliances, drought resistant landscaping, and recycling receptacles. The BMP to plant trees and vegetation on site would result in additional benefits by providing shade to the buildings and parking lot and cooling through evapotranspiration. Operational BMPs would also reduce indirect mobile GHG emissions by requiring adequate ingress and egress to minimize vehicle idling and preferential parking for vanpools and carpools to reduce project-related trips. Therefore, with the implementation of all feasible BMPs provided in Section 2.3.2 of the Draft EIS, Alternative A would not result in a significant adverse cumulative impact associated with climate change.

As discussed on page 4.15-14 of the Draft EIS, characteristics of Alternative A are not unique or specifically vulnerable to the impacts of climate change. The effects of increasing temperatures and frequency of extreme heat days or extreme weather conditions would be dampened by the use of on-site HVAC units. The Strawberry Fields Site is located in a predominantly urban area, adequately served by emergency services including the proposed Public Safety Building, and would not be significantly at risk to wildfires or extreme weather conditions as a result of climate change.

3.17 MITIGATION MEASURES AND BEST MANAGEMENT PRACTICES (BMPS)

Summary of Comments: A number of commenters question the commitment, enforceability and specificity of the proposed mitigation measures. Several comments state that the Draft EIS mitigation measures are inadequate or deficient. Some comments indicate the Draft EIS relies improperly on the agreements between the Redding Rancheria, the City of Redding, and Shasta County to ensure that mitigation is conducted and enforced. Other comments question the distinction between mitigation measures and BMPs.

Response: Mitigation measures for the project alternatives are listed in Section 5.0 of the Draft EIS. As stated in Section 5.0 of the Draft EIS, mitigation measures were developed in accordance with the Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations. CEQ regulations require mitigation measures to be developed for all of a proposed action's effects on the environment where feasible (40 CFR §1502.14(e) and 1502.16(a)). The NEPA regulations states that mitigation includes:

> "…avoiding the impact altogether by not taking a certain action or parts of an action; minimizing impacts by limiting the degree or magnitude of the action and its implementation; rectifying the impact by repairing, rehabilitating, or restoring the affected environment; reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; compensating for the impact by replacing or providing substitute resources or environments" (40 CFR §1508.1). (Section 5.2 of the Draft EIS).

Regarding enforcement, the EIS is not the document that commits the agency to mitigation. Rather, it is the Record of Decision (ROD) that does so. As required by 40 CFR §1505, the BIA or other appropriate consenting agency shall be responsible for ensuring that mitigation adopted within the ROD is implemented. 40 CFR §1505.2 states, where applicable, a Mitigation Monitoring and Enforcement Plan

(MMEP) shall be adopted and summarized within the ROD. Mitigation enforceable by parties other than the BIA, e.g. permits (i.e. the National Pollutant Discharge Elimination System [NPDES] permit) or enforceable agreements (i.e. an agreement between the Tribe and local governments and/or a Tribal-State Compact), may not require a monitoring and enforcement program. All listed mitigation measures and BMPs listed in Final EIS Section 5.0 are enforceable because they are: 1) inherent to the project design, and/or 2) required through federal or tribal laws, regulations, and ordinances, where applicable.

As detailed within Section 5.0 of the Draft EIS, one mitigation measure is enforceable through the terms of the Compact. Please See Draft EIS Section 1.5.1 for more information concerning the Compact. In regard to the ability of the respective parties to renegotiate the terms of the Compact, this does not weaken the Compact's enforcement mechanism as all of the respective parties must agree to any amendments; thus, ensuring that any one party cannot unilaterally alter the agreement in its favor.

Regarding specific mitigation measures that may be affected by an agreement between the Tribe and the City and County, such mitigation measures listed in Section 5 of the Draft EIS and Final EIS can be amended, as applicable, if intergovernmental agreements are reached prior to their inclusion in the MMEP, which is part of the ROD (see discussion above). Accordingly, mitigation measures in the Final EIS, Volume II, Section 5.10 have been revised to reflect the IGA between the Tribe and the County that was entered into subsequent to the release of the Draft EIS. However, as described above, the mitigation measures contained in the MMEP / ROD are enforceable, even in the absence of an agreement between the Tribe and the City and/or County. The only exceptions are those Mitigation Measures described in Section 5.10 that are for the provision of law enforcement, fire, and EMS services. As described in **General Response 3.6.3**, subsequent to the publication of the Draft EIS, in the event the existing County IGA is terminated and a new agreement cannot be reached, the Tribe would fund the construction and operation of a Public Safety Building on the Strawberry Fields Site. This is described as police, fire and EMS Option 2 in Final EIS, Volume 2, Section 4.10.

Regarding the connection between mitigation measures and BMPs, it should be noted that these are related yet separate concepts. This is the case, notwithstanding that BMPs are listed in Draft EIS Section 5.0 that is titled "Mitigation Measures". This distinction is explained in Section 6.4.6 of the of the 2012 BIA NEPA Guidebook:

> "Measures or practices will only be termed mitigation measures if they have not been incorporated into the proposed action or alternatives. If mitigation measures are incorporated into the proposed action or alternatives, they are design elements, not mitigation measures. Design elements are those specific means, measures or practices that make up the proposed action and alternatives. Standard operating procedures, stipulations, and best management practices are usually considered design elements (43 CFR §46.130(b))."[14]

Thus, unlike mitigation measures, BMPs are integral elements of project design and therefore serve as an

[14] Source: Indian Affairs National Environmental Policy Act (NEPA) Guidebook, 59 IAM 3-H, dated August 2012, accessed online October 2, 2019 at: https://www.bia.gov/sites/bia.gov/files/assets/public/raca/handbook/pdf/59_IAM_3-H_v1.1_508_OIMT.pdf

underlying assumption within environmental analysis of the EIS. Changes to or elimination of the assumed BMPs could constitute a substantive change to the project that could trigger the need for supplemental NEPA review. In a letter dated June 17, 2019 (Comment Letter T5), the Tribe expressed its commitment to implementing BMPs and mitigation measures specified in the ROD should the project be approved.

SECTION 4.0
INDIVIDUAL RESPONSE TO COMMENTS

This section contains responses to comments that were received during the public comment period on the Draft EIS and included in **Section 2.0**. Comments may be addressed with an individual response in this Section 4.0, with a general response in **Section 3.0**, or by reference to a specific response. Based on the comments received for the Draft EIS, revisions have been made in the Final EIS (Volume II) to improve language, enhance data, and provide clarification consistent with the President's CEQ Regulation 40 CFR § 1503.4 and the BIA NEPA Guidebook (59 IAM 3-H), Section 8.5.3. The location of the changes to the Draft EIS are identified in the applicable responses.

COMMENT LETTER A1: CENTRAL VALLEY FLOOD PROTECTION BOARD

Response to Comment A1-01

Draft EIS Section 3.3.2 identified the Central Valley Flood Protection Board's jurisdiction in relation to the alternative project sites. With regard to Alternatives A through D, which would occur on the proposed Strawberry Fields Site as identified in the Draft EIS Section 3.3.2, the Board currently has jurisdiction of the Sacramento River within the designated floodway which follows the boundary line of the FEMA 100-year floodplain or is located west of the FEMA 100-year floodplain boundary line as shown in Figure 3.3-1. For Alternatives A through D, the only development within the floodway would be the planting of native willow, oak, cottonwood, and sycamore trees to stabilize the streambank and excavation for the proposed infiltration wet pond.

With regard to Alternative E, the Anderson Site is not located near a Board-regulated stream or designated floodway. Alternative E proposes no construction within a Board-designated floodway.

With regard to Alternative F, the existing Win-River Casino Site is located partly within the Board designated floodway of Clear Creek. Alternative F proposes no construction within a Board-designated floodway. The construction of the proposed event center and parking garage under Alternative F would occur outside of the designated floodway.

In summary, only Alternatives A through D proposed any development within a Board-designated floodway. While the Board has jurisdiction of the Sacramento River, the proposed fee-to-trust transfer of the Strawberry Fields Site would remove the site from the State of California's jurisdiction. Once in federal trust, Board regulations would not apply to activities on the site as the Board's oversight does not apply to the activities of the United States or its agencies (Title 23 California Code of Regulations, Section 2(d)). The Environmental Protection Agency and U.S. Army Corps of Engineers would still retain jurisdiction under the Clean Water Act.

COMMENT LETTER A2: STATE BOARD OF EQUALIZATION

Response to Comment A2-01

Comment noted; commenter expresses support for the Proposed Project. Refer to **General Response 3.2.1** regarding expressions of opinion.

COMMENT LETTER A3: CONGRESS OF THE UNITED STATES, WASHINGTON, DC

Response to Comment A3-01

Comment noted; commenter expresses support for the Proposed Project. Refer to **General Response 3.2.1** regarding expressions of opinion.

COMMENT LETTER A4: MAYOR JULIE WINTER, CITY OF REDDING, CA

Response to Comment A4-01

Please see **General Response 3.6.2** regarding substitution effects to local businesses, and sporting goods retailers in particular. Regarding potential effects to the Civic Auditorium, please note that Alternative A has been modified to remove the amphitheater component. Please see revised text in Final EIS Section 2.7.1. Also note that the conference center and event center still remain as Alternative A components. Removal of the amphitheater component would reduce competitive effects to the City Auditorium. Also, it should be noted that some of conference center and event center events would not occur in the city, if not for the gaming element of Alternative A. Consequently, such events would not occur at the City's Civic Auditorium in the absence of Alternative A, and thus would not result in substitution effects. However, the Alternative A event center would likely compete with the Civic Auditorium to some extent. The new entertainment venue would increase the capacity of the Tribe's current entertainment venue at the existing Win-River Casino, which would be closed under Alternative A, by 800 seats. As stated in Final EIS Volume II, Appendix L, Response A-4.1, the entertainment content for both the Redding Civic Auditorium and Cascade Theater was analyzed, and it was determined that most of the entertainment at these venues (which included symphony, performing arts, community events, holiday shows, etc.) would not be hosted by the proposed new conference center and event center under Alternative A. Therefore, the project alternatives would not cause the Civic Auditorium to experience significant competitive or substitution effects. Please refer to **General Response 3.6.4** regarding fiscal effects to local governments.

Response to Comment A4-02

The overall traffic study methodology was coordinated comprehensively with the City prior to the preparation of the TIS (Draft EIS Appendix F). City staff were integral to the process of defining development assumptions for the analysis scenarios, preferred mitigation geometrics (Interstate-5/South Bonnyview interchange) and ensuring consistency with other concurrent development projects and Capital Improvement Program (CIP) projects. This level of coordination with the City was warranted for a number of reasons, including the close proximity of the Strawberry Fields Site to City limits, the fact that the site is within the City's sphere of influence, and the scope of the Proposed Project.

Since these prior coordination efforts, the City proceeded with a concurrent transportation impact study and Final Environmental Impact Report (EIR) for a nearby development known as the River Crossing Marketplace. As per the *River Crossing Marketplace Specific Plan EIR*[1], "Under the Year 2040 with Rancheria plus Project scenario…cumulative impacts at intersection #5 [South Bonnyview Road/Bechelli Lane] would be mitigated with implementation of Mitigation Measure TRANS-1.1 [Reconstruct the intersection and approaches into a four-leg, two-lane roundabout in accordance with the specifications of the City Engineer]." The City provided improvement plans for the construction of South Bonnyview Road improvements at Bechelli Lane and the I-5 interchange ramps[2,3], the combination of which are understood to be representative of the aforementioned "TRANS-1.1." These improvements have been fully constructed and the facilities were opened to traffic in November 2022. This constructed mitigation was specifically noted as accommodating the cumulative "Year 2040 with Rancheria plus Project" conditions, which included regional growth in the Shasta County Regional Transportation Model, as well as the known projects in the project vicinity, including but not limited to the Redding Rancheria Casino Project Alternative A, which was described as "a new casino and resort, an approximately 69,515-square-foot casino, a 250-room hotel, an event- convention center, and a retail center, as well as associated parking and infrastructure"[4]. Because year 2040 conditions would have higher volumes than Opening Year conditions, this noted improvement is considered to have adequately mitigated the significant impact of Alternative A at the South Bonnyview Road/Bechelli Lane intersection. Accordingly, the Proposed Project has no mitigation responsibility at this intersection and the Updated TIS reflects these changes.

It is important to note that the November 17, 2017, Omni-Means/GHD memorandum preceded the June 2018 traffic impact study (the traffic impact study incorporated in the Draft EIS, also referred to herein as the TIS or Draft EIS Appendix F) in which the majority of the comments were specifically addressed. Kimley-Horn previously prepared comprehensive responses to Omni-Means'/GHD's November 17, 2017, comments in a memorandum dated June 11, 2018. These prior responses are summarized and further supported by the enhanced "Project Trip Generation" Section contained in the Updated TIS. No further changes are warranted.

Peak-hour. Due to the unique trip generation characteristics of tribal gaming facilities, it was determined that the Friday and Saturday PM peak-periods represent the worst-case periods during which to evaluate the Proposed Project. It is during these periods that the combination of background traffic and casino traffic are anticipated to be at the highest levels. As a result, it can be concluded that the peak-hours of the project (i.e., the "peak-hour of generator") were used to analyze the effects of the Proposed Project on the surrounding transportation network. Please see the "Project Trip Generation" Section contained the Updated TIS for additional information (Final EIS, Appendix Q). The expanded discussion includes details pertaining to the use of similar methodology in numerous other tribal gaming facility EIS traffic studies, and data supporting the use of Friday and Saturday evenings as the peak-hours for this study.

[1] *Final Environmental Impact Report, State Clearinghouse No. 2017052030, River Crossing Marketplace Specific Plan*, Pages 7-7 and 7-8, PlaceWorks, March 2020.
[2] *Project Plans for the Construction of S. Bonnyview Rd/I-5 Phase II Improvements Bechelli Ln Roundabout*, GHD, October 2021.
[3] *Project Plans for Construction on State Highway in Shasta County in and Near Redding From 0.4 Miles South to 0.5 miles north of Churn Creek Road Overcrossing*, GHD, October 2021.
[4] *Recirculated Draft Environmental Impact Report, State Clearinghouse No. 2017052030, River Crossing Marketplace Specific Plan*, Pages 4.12-43 through 4.12-49, PlaceWorks, December 2019.

Hotel Trip General Rates. Additional detail has also been provided in the Updated TIS related to the use of project trip internalization, including the reduction applied to the hotel use's trip numbers (see page 59 of Final EIS Appendix Q). As discussed therein, Trip generation for the hotel use proposed in Alternatives A, B, and C was calculated based on data from the ITE Trip Generation Manual, 9th Edition, but was also adjusted with the assumption that most guests at the hotel would also be guests of the casino. Typically, casinos with on-site hotel facilities implement a pricing structure for the rooms that favors casino guests. Therefore, the ITE hotel trip generation rate was reduced by 75 percent to account for internal capture to and from the casino. Reducing the base hotel rate by 75 percent is based on professional judgment and is generally consistent with the hotel trip generation adjustments demonstrated in the traffic studies for other northern California gaming facilities.

The TIS and Updated TIS model Opening Year (2025) plus Proposed Project Conditions are the most comprehensive snapshot of realistic conditions anticipated to be realized upon opening of the project. Unlike "Existing plus Proposed Project" conditions, the use of "Opening Year" allows for comprehensive consideration of background traffic growth, traffic from known development activity, and the full effect of the Proposed Project.

According to the City's *Traffic Impact Analysis Guidelines* (Section 3.1 (B)), the following scenarios are defined as "cumulative":

- "Existing plus Approved/Pending Projects List
- Existing plus Approved/Pending Projects List plus Proposed Project
- 2030 Shasta County Travel Demand Model (SCTDM) without Proposed Project
- 2030 SCTDM plus Proposed Project"

Accordingly, the TIS' inclusion of both "Opening Year (2025) Conditions," conditions representative of Existing plus Approved/Pending Projects, and "Cumulative (2040) Conditions" satisfy the City's requirement for comprehensive "cumulative" analyses. It was our understanding that this approach, the inclusion of "Opening Year (2025) Conditions" analyses, is consistent with the guidance received from local and state agencies during the traffic study planning process, which occurred during 2016. At this juncture, the consensus was that there were various development projects that were likely to be completed prior to 2025. Because some of these projects were relatively large, it was proposed that a 2025 analysis that included them would render a more accurate impact analysis than a simpler approach that focused only on the impacts of the Proposed Project. For this reason, Kimley-Horn projected the Year 2025 plus Proposed Project Conditions traffic in such a way that other development projects were included, which resulted in what is effectively a cumulative analysis. Consistent with a cumulative analysis, fair share percentages were applied. As required by the City's *Guidelines*, the fair share mitigations identified for Opening Year (2025) and Cumulative (2040) Conditions were calculated based the methodology as provided in Caltrans' *Guide for the Preparation of Traffic Impact Studies* (Caltrans, December 2002).

In the course of updating the traffic analysis as documented in the "Proposed Project Mitigations" Section of the Updated TIS, Kimley-Horn updated the methodology used to calculate the project's fair share responsibilities. This change in methodology generally resulted in different, but typically higher fair share

percentages for the project alternatives. In all cases, fair share percentages were calculated for the appropriate peak-hour during which a subject impact was triggered. When an impact was triggered in both Friday and Saturday peak-hours, the higher (worse) resulting LOS and fair share percentage were used to define the impacts. A summary of the fair share percentages has been prepared and is included as part of Appendix J of the Updated TIS, which is provided as Final EIS Appendix Q.

Response to Comment A4-03

Please see **General Response 3.8.1** regarding zoning and the consistency of project alternatives with the City and County general plans.

Response to Comment A4-04

The commenter is correct that delivery of electricity by REU is at the discretion of the City. Final EIS Sections 2.0 and 4.10 have been updated to state that electricity will be delivered by either REU or PG&E. See the revised text in these sections.

Response to Comment A4-05

As identified in Section 2 of the Draft EIS, two water supply options are identified for Alternatives A through D. Option 1 is connection to the City of Redding's municipal water supply infrastructure. Option 2 is the development of groundwater wells on the project site. The City's comments are directed to Option 1. The City's water supply is a combination of surface water supplied under two U.S. Bureau of Reclamation (USBR) contracts and a contract with the Anderson-Cottonwood Irrigation District, and groundwater from wells within the City. The Strawberry Fields Site is adjacent to, but not within, the City Limit and the service area of the City's Sacramento River USBR contracts. As the City states, currently the project cannot be served by surface water provided under the USBR contracts because the place of use is restricted to the existing service area. However, the contracts provide for changing the place of use by inclusion upon the USBR's written consent. As identified in the Draft EIS Appendix M (Section 4.3.1), for the City to change its water service area, Local Agency Formation Commission (LAFCO) review may also be required. Regardless of whether the City provides groundwater or a blend of groundwater and surface water under Option 1, Sections 4.3, 4.10, and 4.14 of the Draft EIS address the potential environmental effects of this supply option.

Response to Comment A4-06

The Draft EIS identifies two wastewater service options for Alternatives A through D. Option 1 is connection to the City's wastewater conveyance and treatment system. Option 2 is development of an on-site wastewater treatment plant. Under Option 1, the Draft EIS Section 4.10.1 identifies that the City's Westside Interceptor is currently at capacity and experiences localized overflows during storm events. Draft EIS Section 4.10 also states that with the City's proposed improvements to the interceptor in 2022, the facility would have sufficient capacity to serve Alternatives A through D. The City's comments confirm that the specific improvement project is the Westside Interceptor Phase III Pipeline and it is scheduled to be completed by 2025 per the City's 2022-2027 Capital Improvement Plan.

The City's suggested correction to Section 4.3.1 of the Draft EIS has been made; the word "wastewater" was replaced with the word "water." The conclusions of the section have not changed.

Regarding the City's request for additional details on the infiltration capacity of the proposed vegetated swale under Alternative D, as described in Draft EIS Section 2.3, the site plans for Alternatives A through D incorporate a 2,730-foot long (approximately one-half mile), 20-foot wide, 5-foot deep vegetated swale running north to south between the access road and Interstate-5. The vegetated swale would convey project runoff, provide stormwater filtration and infiltration, and provide a bypass channel for 600-700 cubic feet per second (cfs) of stormflows that could overflow from Churn Creek during extreme rain events. The vegetated swale would pass through a large box culvert under the access road and to a 60,000-square-foot vegetated stormwater infiltration area (approximately 1.4 acres) of infiltration area. The soil profile in the area of the swale and infiltration area is characterized by the geotechnical investigation performed by Mid Pacific Engineers (MPE) in January of 2020. Percolation testing was performed on-site by Blackburn Consulting (BC) in November of 2019. The northern 1,020 ft (20,400 sq. ft.) of the swale would have a finished bottom in Silty Sand (SM) per MPE's TP-11. BC completed 11 percolation tests in SM with an average percolation rate of 8.38 min/in or K = 0.00505 cm/s. The assimilative capacity of this area is 3.3 ft3/s. The middle 920 ft (18,400 sq. ft.) of the swale would have a finished bottom in Low Plasticity Silt (ML) per MPE's TP-32 & TP-36. BC has no percolation tests in ML. Spangler & Handy's middle value for silt is K=10-4 cm/s. The assimilative capacity of this area is 0.6 ft3/s. The southern 790 ft of the swale and the 340 ft. X 130 ft. vegetated infiltration area (combined 60,000 sq. ft.) would have a finished bottom in Poorly Graded Sand (SP) per MPE's TP-37. BC has no percolation tests in SP. Spangler & Handy's middle value for Graded Sand / Fine Sand is K=10-2 cm/s. The assimilative capacity of this area is 196.9 ft3/s. The cumulative total assimilative capacity of the vegetated swale and terminal infiltration area is 200 ft3/s. This is in addition to the 38 ft3/s provided by infiltration trenches that make up the onsite storm drainage system.

Response to Comment A4-07

Although the proposed 9-story hotel and 5-story parking garage may be taller than any other existing, approved, or proposed building adjacent to I-5 within the City, they would not significantly impede views of scenic resources and would not be uncharacteristic of the area as a whole due to other commercial developments, such as Mt. Shasta Mall, multi-story office buildings, the multi-story Hilton Garden Inn, the FedEx freight distribution center, Costco, and Hilltop Mall. The commenter is correct that the view from the perspective of Viewpoint B would be altered, as shown in Draft EIS Figure 4.13-2. Specifically, as described in Draft EIS Section 4.13.1 and depicted in Figure 4.13-2: "While the casino and hotel development would represent a major alteration, travelers would only experience the altered view for a short time due to high motorist speeds." In other words, although the hotel component would partially obscure the view of the mountains, this would occur for a relatively small portion of the mountain view, and the effect would be temporary from the perspective of a highway motorist. Consequently, the aesthetic effect is less than significant. Nonetheless, the opinion of the commenter is acknowledged. Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements.

Response to Comment A4-08

Refer to **Response to Comment A4-02**. The Updated TIS (Final EIS Appendix Q, Page 20) includes additional detail pertaining to the adjustment factors that were applied to the July traffic counts to increase the volumes to reflect the observed seasonal variation.

Response to Comment A4-09

Refer to **Response to Comment A4-02**. Please see the "Project Trip Generation" discussion contained in the Updated TIS (Final EIS Appendix Q). The expanded discussion includes details pertaining to the use of similar methodology in numerous other tribal gaming facility EIS traffic studies, and data supporting the use of Friday and Saturday evenings as the peak-hours for this study. As a result, while the stated differences between the Costco TIAR "weekday" and this study's Friday traffic volumes are noted, because it is considered to be more appropriate to analyze the Friday PM peak-hour, the relationship between the two days' volumes is considered to be irrelevant.

Response to Comment A4-10

Refer to **Response to Comment A4-02** regarding most methodological questions included in the comment. Please note that this traffic study evaluated an Opening Year condition as year 2025, further defined as assuming existing roadway geometry/traffic control. While the Updated TIS (Final EIS Appendix Q, Page 36) does describe the application of linear interpretation, it goes on to clarify that "Opening Year (2025) traffic volumes assume the full buildout of the River Crossing Marketplace, including a 152,101-square foot Costco, located in the northwest quadrant of the South Bonnyview Road/I-5 interchange." Furthermore, because the Opening Year (2025) traffic volumes for Intersections #1-9 were taken directly from the River Crossing Marketplace traffic study, consistent with this City-led project, identical traffic forecasting methodologies and assumptions for the level of development associated with known development projects east of I-5 are included in the volumes used in this study.

Level of Service (LOS) worksheets for Opening Year (2025) Conditions are provided in Appendix E of the Updated TIS (Final EIS Appendix Q).

The direct comparison of peak-hour traffic volumes for different days of the week and different hours of the day is reasonably expected to reveal differences. The commenter suggests that they are directly comparing Tuesday-Thursday PM peak-hour to this study's Friday PM peak-hour, and the Saturday mid-day peak-hour to this study's Saturday PM peak-hour. Please see the "Baseline Conditions" discussion contained in the Updated TIS on Page 36 in which it is clarified that this study's Friday PM peak-hour volumes, because they were obtained directly from the River Crossing Marketplace study, are weekday (Tuesday-Thursday) PM peak-hour volumes. This clarification explains why the weekday volumes are similar between the two studies. The expanded discussion also includes details pertaining to the use of similar methodology in numerous other tribal gaming facility EIS traffic studies, and data supporting the use of Friday and Saturday evenings as the peak-hours for this study. As noted above, because the primary source of Year 2025 volumes is from the subject "Costco" traffic study, the noted differences in intersection volumes is reasonably anticipated to be due to the difference in the specific peak-hour of analysis (Saturday mid-day vs. Saturday PM).

Response to Comment A4-11

Refer to **Response to Comment A4-02** regarding the sequencing of comments and traffic study iterations. Please note that the TIS and Updated TIS evaluate a Cumulative Condition as year 2040, further defined as assuming existing roadway geometry/traffic control. The use of year 2040 allowed for consistency between this study and the *River Crossing Marketplace Specific Plan Traffic Impact Analysis Report* which also used year 2040 for Cumulative Conditions. As noted, the traffic volumes used in these studies are higher than the referenced volumes from the South Bonnyview/I-5 Interchange PSR, which implies that the analysis and conclusions are conservative. Regardless of the "no project" operations, the TIS and Updated TIS comprehensively evaluate the effect of the addition of the Proposed Project. Per the City's direction, the TIS and Updated TIS have inherent assumptions of the level of development and the interchange area's forecasted traffic volumes.

Table 11 of the Updated TIS summarizes the Cumulative Year (2040) Conditions intersection levels of service. As shown, the Interstate-5/South Bonnyview Interchange area intersections (Intersections #3-7) are shown to operate from LOS A to LOS F. Contrary to the commenter's assessment, the addition of the Proposed Project is shown to result in significant impacts (LOS F) at all five of the interchange area intersections under Cumulative (2040) Conditions (Final EIS Appendix Q, Table 28). As a result, the documented future operations are considered to be consistent with other studies and, therefore, the impacts revealed are appropriately isolated and allocated to the Proposed Project. As per the *River Crossing Marketplace Specific Plan EIR*, "Under the Year 2040 with Rancheria plus Project scenario…cumulative impacts at intersection #5 [South Bonnyview Road/Bechelli Lane] would be mitigated with implementation of Mitigation Measure TRANS-1.1 [Reconstruct the intersection and approaches into a four-leg, two-lane roundabout in accordance with the specifications of the City Engineer]." The City provided improvement plans for the construction of South Bonnyview Road improvements at Bechelli Lane and the I-5 interchange ramps, the combination of which are understood to be representative of the aforementioned "TRANS-1.1." These improvements have been fully constructed and the facilities were opened to traffic in November 2022. Accordingly, the project has no mitigation responsibility at this intersection and the Updated TIS reflects these changes (Final EISAppendix Q). Please see **Response to Comment A4-02** for further information.

Response to Comment A4-12

A year 2045 Cumulative Conditions analysis is not included in the TIS or Updated TIS. Nevertheless, please note that references to a "diverging diamond interchange" are made in response to the City's direction as documented in Omni-Means' technical memoranda sourced throughout the TIS and Updated TIS. Regardless of the current funding situation, the impacts of the addition of the Proposed Project (on existing geometric conditions) under Cumulative (2040) Conditions are thoroughly documented, and the project's fair share responsibility of implementing the long-term desired configuration (diverging diamond interchange) have been calculated in a manner consistent with the City's traffic study *Guidelines* (see Appendix J of the Updated TIS, provided as Final EIS Appendix Q).

Response to Comment A4-13

Refer to **Response to Comments A4-02** and **A4-10** regarding why Friday pm and Saturday pm were identified as peak hours.

Response to Comment A4-14

Comment noted.

Response to Comment A4-15

Comment noted.

Response to Comment A4-16

Refer to **Response to Comments A4-02** and **A4-10** regarding why Friday pm and Saturday pm were identified as peak hours.

Response to Comment A4-17

A summary of the technical analysis parameters used in this study are provided in the Updated TIS (see (Final Appendix Q, Page 9).

Response to Comment A4-18

Refer to **Response to Comment A4-02**.

Response to Comment A4-19

Refer to **Response to Comment A4-10**. It is typical for traffic counts performed for the purposes of different traffic studies, and therefore collected at different times on different days of the week, to result in different operations results. In this instance, the Draft TIS and the *River Crossing Marketplace Specific Plan Final Environmental Impact Report* document peak hour traffic counts at the overlapping South Bonnyview Road intersections in the vicinity of the Interstate-5 interchange.

The Draft TIS used counts collected in July 2016, adjusted to represent September 2016, to establish the existing intersection levels of service (Friday 5:00 PM to 7:00 PM, and Saturday 5:00 PM to 7:00 PM). Conversely, the *River Crossing Marketplace* study, while it also used September 2016 counts for its existing conditions, analyzed intersection levels of service during different periods (Tuesday/Wednesday 4:00 PM to 6:00 PM, and Saturday 11:00 AM to 1:00 PM). We noted that the differences in volumes (due to different days of the week and respective peak-hours) range from zero to approximately 200 peak-hour vehicles for the various movements. This range of difference is to be expected given the differences in methodology concerning days of the week and peak-hours.

Response to Comment A4-20

Refer to **Response to Comment A4-02**, specifically as it pertains to the identification of analysis peak-periods. Fair share percentages were calculated for the appropriate peak-hour during which a subject impact was triggered. When an impact was triggered in both Friday and Saturday peak-hours, the higher (worse) resulting LOS and fair share percentage were used to define the impacts. Fair share percentages are presented in the "Proposed Project Mitigations" Section and Appendix J of the Updated TIS (Final EIS Appendix Q).

It should also be noted that a more conservative methodology was employed to calculate the "fair share" percentages listed in the Updated TIS. Specifically, the fair share percentages provided in the Updated TIS are generally higher than the Original TIS.

For Opening Year (2025) Conditions, the fair share percentages are based on 2025 background traffic volumes. For Cumulative (2040) Conditions, the fair share percentages are based on 2040 background traffic volumes. However, if a Cumulative (2040) Conditions mitigation measure was determined to be the same as the respective Opening Year (2025) Conditions mitigation measure, then the fair share calculation refers back to the Opening Year (2025) Conditions fair share calculation. See Page 151 in the Updated TIS for a comprehensive description of this methodology.

Response to Comment A4-21

A comprehensive summary of anticipated intersection queues for the Cumulative (2040) Conditions is provided in Appendix D of the Updated TIS (Final EIS Appendix Q). These are considered to be the worst-case conditions under which to evaluate intersection queuing because the background traffic volumes are highest under Cumulative (2040) Conditions and the resulting operations (queuing in particular) are anticipated to be the worst. The queue results are provided for Access Option 1 and Access Option 3, in which the most concentrated queues are anticipated. As documented therein, the addition of the Proposed Project does not contribute a substantial amount of additional queuing to any of the subject intersecting turning movements.

The majority of the movements do not have queues that exceed the available storage. While the Proposed Project adds additional queuing, the mitigation improvements required to achieve acceptable levels of service are shown to result in queues that are contained within the storage provided, with the exception of Intersection #3 (South Bonnyview Road/Bechelli Lane). The northbound right and the westbound left movements of Intersection #3 contain queues that are reported to exceed the available storage under Mitigated plus Project conditions as shown in Appendix D of the Updated TIS. However, the available storage was measured based on existing (2016) geometry. It should be noted that the intersection geometry may change if the mitigation improvements proposed for Opening Year (2025) are implemented. As per the *River Crossing Marketplace Specific Plan EIR*, "Under the Year 2040 with Rancheria plus Project scenario…cumulative impacts at intersection #5 [South Bonnyview Road/Bechelli Lane] would be mitigated with implementation of Mitigation Measure TRANS-1.1 [Reconstruct the intersection and approaches into a four-leg, two-lane roundabout in accordance with the specifications of the City Engineer]." The City provided improvement plans for the construction of South Bonnyview Road improvements at Bechelli Lane and the I-5 interchange ramps, the combination of which are

understood to be representative of the aforementioned "TRANS-1.1." These improvements have been fully constructed and the facilities were opened to traffic in November 2022. Accordingly, the project has no mitigation responsibility at this intersection and the Updated TIS reflects these changes. Please see **Response to Comment A4-02** for further information.

Response to Comment A4-22

The discussion on Page 178 of the Updated TIS pertaining to alternate travel modes has been updated to address impacts of the 2019 Shasta County *Go Shasta Regional Active Transportation Plan*.

Response to Comment A4-23

In concert with the TIS (Draft EIS Appendix F), Kimley-Horn completed a detailed preliminary engineering assessment of the various project access conditions. These engineering efforts, combined with the "Bonnyview Interchange (Exit 675) Improvements Project Study Report – Project Development Support" (PSR_PDS Preferred Alternative 4B) prepared by the City for Caltrans, comprehensively detail the footprint of the various improvements, some of which are mitigations, along the South Bonnyview Road corridor in the vicinity of I-5. As a result, it is reasonable to assume that the proposed mitigation improvements are feasible. As per the *River Crossing Marketplace Specific Plan EIR*, "Under the Year 2040 with Rancheria plus Project scenario…cumulative impacts at intersection #5 [South Bonnyview Road/Bechelli Lane] would be mitigated with implementation of Mitigation Measure TRANS-1.1 [Reconstruct the intersection and approaches into a four-leg, two-lane roundabout in accordance with the specifications of the City Engineer]." The City provided improvement plans for the construction of South Bonnyview Road improvements at Bechelli Lane and the I-5 interchange ramps, the combination of which are understood to be representative of the aforementioned "TRANS-1.1." These improvements have been fully constructed and the facilities were opened to traffic in November 2022. Please see **Response to Comment A4-02** for further information.

The commenter is correct that the design elements of these proposed mitigation improvements are at a preliminary stage, and that elements of the mitigation features may be refined prior to their construction. Each of the proposed traffic improvements will be designed and constructed to comply with applicable federal, state, and local regulations. Because the Tribe does not have jurisdiction over any of the off-reservation proposed mitigation, it will not directly implement the traffic improvements. Rather, implementation of traffic mitigation will be under the purview of the applicable jurisdictional agency. As stated in Draft EIS Section 5.8, the Tribe proposes "fair share contributions" which will be applied towards implementation of traffic mitigation measures. The level of detail of these future improvements described in the Update Traffic Study is appropriate for this stage of the planning and evaluation process. It is possible that one or more of the traffic improvements described in the Updated Traffic Study will ultimately be determined to be infeasible, in which case equivalent traffic improvements may be implemented provided that the jurisdictional agencies and Tribe agree regarding the efficacy of such alternative improvements.

Response to Comment A4-24

While the commenter alludes to physical constraints, the City's construction of the River Crossing Marketplace Specific Plan EIR Mitigation Measure Trans-1.1 is understood to fully mitigate the subject intersection's operations. As such, the noted "physical constraints" are moot as the previously identified mitigation is not necessary as the City as fully mitigated by constructing the roundabout improvements at this location.

Response to Comment A4-25

In regard to the southbound right-turn lane at the South Bonnyview Road and Interstate 5 southbound off-ramp terminus and mitigation of southbound off-ramp queuing onto the mainline Interstate 5, please see **Response to Comments A4-21** and **A4-23**. The improved efficiency achieved by the change in operation of the southbound right-turn lane, in conjunction with other mitigations along the corridor, are documented to improve the conditions to which the commenter refers (queuing onto mainline I-5 during peak periods). This queue is confirmed to be contained within the southbound off-ramp.

The “yield control” used to describe the ramp terminus should not be mistaken with “free control”. The described “yield control” would minimize the downstream weaving operation as noted by the commenter by essentially “metering” the flow of traffic exiting southbound I-5 with destinations to the west (including to southbound Bechelli Lane). Furthermore, the “weave” condition mentioned by the commenter would only be applicable to the subset of vehicles which are destined for southbound Bechelli Lane.

Under Opening Year (2025) Friday PM Conditions, 26 percent of vehicles making a southbound right from the I-5 southbound off-ramp are destined for southbound Bechelli Lane. Under Opening Year (2025) Saturday PM Conditions, 39 percent of vehicles making a southbound right from the I-5 southbound off-ramp are destined for southbound Bechelli Lane. As stated above, the yield control will minimize the likelihood of these vehicles “weaving” as they approach Bechelli Lane. Figure 10 and Figure 36 in the Updated TIS include the volumes used to calculate the aforementioned percentages.

COMMENT LETTER A5: ENVIRONMENTAL PROTECTION AGENCY

Response to Comment A5-01

The commenter’s preference for Alternative B is acknowledged. Please also see **General Response 3.11** regarding issues related to flooding and floodplains.

Response to Comment A5-02

The hydrology calculations in Draft EIS Appendix C and cited in the Draft EIS were prepared using engineering industry standard methodology (Rational Method) and the on-site storm drain conveyance system has been designed using local jurisdiction requirements for storm events. Rainfall estimates are discussed in detail within the City of Redding Department of Public Works Hydrology Manual. The on-site storm drain infrastructure (inlets, pipes, etc.) was sized using the 10-year design storm in accordance with the Recurrence Interval Requirements from the City of Redding Construction Standards. The peak

flows for the 2-, 10-, and 100-year storm event for a 24-hour period were estimated to ensure that post-developed flows leaving the site do not exceed the existing conditions. An excerpt from the manual discussing the calculation of Redding Area design storms can be found in Appendix A of Final EIS Appendix N.

To accommodate potential increased future peak flows, the on-site storm drain system will operate between 60 and 70 percent capacity under current conditions, leaving additional capacity to accommodate increased flows to at least 140 percent of current design flows. Additionally, Alternatives A through D have been revised to provide a 150-foot setback from the Sacramento River and the finished floor elevations of all structures (there will be no basements) would be approximately 3 feet above the FEMA 100-year water surface elevation, thereby providing additional buffer from the 100-year floodplain. This provides additional protection for potential increased storm water flows in the absence of any industry standard methodology to quantify the increase or decrease of intensity, duration, and frequency of precipitation as a result of climate change.

The commenter's preference for Alternative B is acknowledged.

Response to Comment A5-03

Please see **General Response 3.9** regarding Sacramento River streambank stabilization and vegetative buffer and **General Response 3.11** regarding issues related to flooding and floodplains. As described in Section 6.2.1 of Final EIS Appendix N and Final EIS Section 2.3.2, Alternative A has been revised to provide a 150-foot setback from the top of the bank of the Sacramento River. The Proposed Project would not disturb the existing vertical loam bank and would include establishing riparian trees in the setback area between the existing riverbank and the hardscape features of the Proposed Project. This would stabilize and reduce the meander potential within the mantle of loamy soil while preserving the existing cut bank and natural river processes as described in Bank Swallow Conservation Strategy for the Sacramento River Watershed, California Bank Swallow Technical Advisory Committee, June 2013.

Response to Comment A5-04

As described in Final EIS Appendix M, Section 3.3.2, after publication of the Draft EIS, site-specific geotechnical exploration and testing was completed at the site of Alternatives A-D by Blackburn Consulting (included as an appendix to Final EIS Appendix M). Percolation tests were performed in several locations across the proposed leach field area and were used to determine the average hydraulic loading rate. The percolation tests conclude that only two of the fifteen test locations fall outside the standard range for "usable disposal material" according to the UIC Program. Furthermore, Shasta County's LAMP for OWTS specifies a minimum depth to groundwater based on percolation rates. Based on the demonstrated percolation results, the required minimum depth to groundwater is 5 feet. As provided by Blackburn's test pit logs, the average depth to groundwater is more than 12 feet, which complies with Shasta County Standards. The sizing of the proposed leach field area accounts for Blackburn's site exploration results and is designed to comply with both Shasta County and USEPA's standards for leach field design. A discussion of the percolation tests has been added to Final EIS Section 4.3.

According to Shasta County's LAMP for OWTS, the required horizontal setback distance between a leach field and perennial stream is 100-feet "to be measured from the 10-year flood line or top of bank or other evident high water-line or the expected 10-year flood line." Given this Shasta County standard requiring a setback from the 10-year flood line, the proposed leach field design offers a large factor of safety in the event the Sacramento River floods, as the proposed leach field is located outside the 100-year floodplain.

As described in Draft EIS Section 2.10.5 (Final EIS Section 2.10.6), the use of sprayfields was eliminated as a disposal option, and the associated seasonal storage pond referenced by the commenter would not be required for operation of the leach fields. The updated Wastewater Management and Drinking Water Feasibility Study is included as Final EIS Appendix M.

Response to Comment A5-05

The Westside Interceptor Phase III project is described in Section 5.3.1 of Final EIS Appendix M. The City anticipates having the interceptor go to construction in 2025. If the proposed development occurs before the Westside Interceptor Phase III project is complete, using flow equalization storage on site until the downstream conveyance system is complete would mitigate the possibility of the project contributing to overflows or spills as a result of flows exceeding the capacity of the pipe system. Connection to the City of Redding's system would be subject to the City's approval.

Response to Comment A5-06

As described in Draft EIS Section 2.3.2, "finished floor elevations (there will be no basements) will be approximately 3 feet above the Federal Emergency Management Agency (FEMA) 100-year floodplain." As no basements are proposed, no hazardous materials will be stored in basements as recommended by the Commenter. Although no roadways are within the 100-year floodplain, Final EIS Section 2.3.2 has been clarified to note that all access routes from the building sites to the main access road will be elevated above the FEMA 100-year floodplain to provide safe access to/from the site during flood events, which is consistent with the language in Draft EIS Appendix C noted by the commenter. Please also see **General Response 3.11** regarding issues related to flooding and floodplains.

Response to Comment A5-07

Please see **General Response 3.13** regarding viewpoints from the perspective of persons on the Sacramento River.

COMMENT LETTER A6: SHASTA COUNTY, CHAIRMAN LEONARD MOTY

Response to Comment A6-01

The County was invited to participate as a cooperating agency in the EIS process. In a letter dated December 16, 2016, the County accepted the invitation to participate as a cooperating agency. In a letter dated December 28, 2016, the County provided substantive comments on the Notice of Intent and also

confirmed its acceptance of the invitation to participate as a cooperating agency. Substantial changes were made to the then internal version of the Draft EIS so as to address the County's comments on the Notice of Intent. In a letter dated October 20, 2017, the Administrative Draft EIS was transmitted to the County. In that letter, the BIA respectfully requested that the County send its comments on the Administrative Draft EIS to the BIA by November 20, 2017. As of November 20, 2017, the BIA had no record of having received comments from the County. In order to confirm the County's status, on November 29, 2017 the BIA sent an email to the County to determine if the County had prepared comments on the Administrative Draft EIS. On December 4, 2017 the BIA received an email from the County stating that it had no comments on the Administrative Draft EIS.

In a letter dated March 15, 2019 addressed to the BIA, the County stated or requested that: 1) it was then in the process of preparing a response to the Administrative Draft EIS, and anticipated providing comments to the BIA on or about April 8, 2019, 2) it was then in the process of negotiating an Intergovernmental Mitigation Agreement with the Tribe, 3) requested that the BIA respond to the County's comments on the Administrative Draft prior to releasing the Draft EIS for public comment, and 4) requested that the BIA delay the release of the Draft EIS until after the County and the Tribe had negotiated the Intergovernmental Mitigation Agreement. The Notice of Availability (NOA), which indicated the public release of the Draft EIS, was published on April 19, 2019.

The County's procedural requests are acknowledged. It should be noted that, as described above, the County initially indicated that it did not intend to provide comments on the Administrative Draft EIS. In its March 15, 2019 letter, the County altered its stance and stated that it did intend to provide comments, which would be forthcoming on or around April 8, 2019. But the County also requested that the release of the Draft EIS to the public occur after the negotiation of an Intergovernmental Mitigation Agreement, the occurrence of which was then unknown to the BIA. The BIA proceeded with publication of the Draft EIS on April 19, 2019, which was eleven days after the County's April 8 stated objective for delivery of comments. It should also be noted that, as described in **General Response 3.1.1**, the BIA extended the comment period on the Draft EIS by an additional two weeks. Please see **General Response 3.1.1** for more information regarding the comment period.

On August 15, 2023, the Tribe and the County entered into an Intergovernmental Agreement (IGA), which is included in Final EIS, Volume II, **Appendix R** and incorporated as appropriate throughout the Final EIS. In the IGA, the Tribe and the County acknowledge that each have an interest in ensuring adequate public services and public safety and law enforcement at the Strawberry Fields Site if it is accepted into trust by the federal government and outline payments that would be made to the County to mitigate the potential financial burdens of providing these services to the Strawberry Fields Site.

Response to Comment A6-02

Please refer to **General Response 3.17** regarding enforcement of mitigation and best management practices (BMPs). On August 15, 2023, the Tribe and the County entered into an IGA, which is included in Final EIS, Volume II, **Appendix R** and incorporated as appropriate throughout the Final EIS. In the IGA, the Tribe and the County acknowledge that each have an interest in ensuring adequate public services and public safety and law enforcement at the Strawberry Fields Site if it is accepted into trust by

the federal government and outline payments that would be made to the County to mitigate the potential financial burdens of providing these services to the Strawberry Fields Site.

Response to Comment A6-03

Please see Final EIS Appendix L, which was prepared by Pro Forma Advisors. The data provided in this comment related to recent and more conservative estimates of CFS has been factored into an updated estimate of calls for services and associated fiscal effects from Alternative A provided in Appendix L, and incorporated into Sections 4.7 and 4.10 of the Final EIS. As described in **General Response 3.6.3**, subsequent to the publication of the Draft EIS, the Tribe and the County entered into an IGA that includes stipulations regarding payments to the County for the provision of law enforcement (see Final EIS Section 1.5.4 and **Appendix R**). The recuring payments for law enforcement services is in consideration of the Shasta County Sheriff's Office providing law enforcement services to the Strawberry Fields Site, and the potential for related impacts to the District Attorney, Public Defender, and Probation. Additionally, if the existing County IGA is terminated and a new agreement cannot be reached, the Tribe has put forth an option to fund the construction and operation of a Public Safety Building on the Strawberry Fields Site. The Public Safety Building would be comprised of a police substation and fire and emergency services personnel. If implemented, the services provided at this facility would offset the increase in law enforcement, fire and EMS incidences on the Strawberry Fields Site. In addition, the occurrence of similar incidents at the Tribe's existing Win-River Casino Site should decline dramatically once gaming operations there cease. Please see **General Response 3.6.4** for a more detailed discussion of fiscal effects.

Response to Comment A6-04

Please refer to **General Response 3.17** regarding mitigation enforcement. As described in **General Response 3.6.3**, subsequent to the publication of the Draft EIS, the Tribe and the County entered into an IGA that includes stipulations regarding payments to the County for the provision of fire/emergency service (see Final EIS Section 1.5.4 and **Appendix R**). Additionally, if the existing County IGA is terminated and a new agreement cannot be reached, the Tribe has put forth an option to fund the construction and operation of a Public Safety Building on the Strawberry Fields Site.

Response to Comment A6-05

The footnote to which the commenter is referring (Draft EIS, Page 4.8-2) notes that "the majority of event trips are anticipated to occur outside the PM peak traffic period (4:00 PM to 6:00 PM), as events typically have a start time between 7:00 PM and 8:00 PM." Please note that the 7:00-8:00 timeframe was incorrectly stated as "PM" when "AM" was intended (typical start times between 7:00 AM and 8:00 AM, on both Fridays and Saturdays). With this clarification, the following additional explanation of these facilities' trip generation characteristics still apply. Final EIS Section 4.8 has been updated to reflect this correction.

See the "Event Center Trip Generation" Section of the Updated Traffic Study for additional information on the methodology employed to estimate trips for the event center.

Response to Comment A6-06

The following additional facilities noted have been incorporated and thoroughly evaluated in the Updated TIS:

- Churn Creek Road/Commercial Way intersection
- North and south access on Churn Creek Road south of Smith Road
- Churn Creek/Knighton Road and Knighton Road/Interstate 5 ramp intersection
- Churn Creek Road between Knighton Road and Smith Road
- Knighton Road between interstate 5 and Churn Creek Road

Note that the evaluation of the Churn Creek Road intersection with Commercial Way (Intersection #104 in the Updated TIS) allows for the evaluation of the Churn Creek Bridge as characterized by the commenter. The commenter states that the addition of the project would necessitate a left turn lane into Commercial Way and a right turn out of Commercial Way. The Updated TIS additional analyses show that the addition of the project does not create a significant impact at this intersection when the existing lane configuration is maintained. Regarding the physical integrity of the bridge itself, the County is responsible for the maintenance of this public roadway structure regardless if the project is constructed.

Please note that the segment of Smith Road, from the new road to Churn Creek Road, was previously included in the TIS (Draft EIS Appendix F) and is referred to as Roadway Segment #4.

Response to Comment A6-07

County road maintenance is funded primarily through the accrual of excise tax on gasoline and bonds approved by State voters. Trucks and other vehicles driving to and from the Project Site would contribute to County roadway maintenance funds when purchasing gasoline within the County, which would be similar to other developments in the region. Therefore, while operation of the Proposed Project would generate new traffic that would increase the rate of roadway deterioration, these vehicles and trucks would purchase gasoline within County and thus contribute to County's road maintenance through the excise tax on the gasoline. Additionally, the IGA between the Tribe and the County includes recurring payments to the County in the amount of $50,000 per year to maintain the County's roads and traffic controls. The County will have sole discretion in determining what improvements are necessary for the roadway systems in order to serve all its users, including ensuring that access to the Strawberry Fields Site is secured and maintained for commercial and business traffic.

Response to Comment A6-08

Runoff from the Strawberry Fields Site (Alternatives A-D) will be infiltrated as described in the response to comment A4-6 and within perforated on-site storm drainage pipes in gravel filled trenches that extend into the underlying sandy gravel stratum prior to reaching the 100-year floodplain of the Sacramento River. The vegetated swale that runs along the easterly project boundary is designed to provide emergency conveyance of possible storm water overflow from Churn Creek east of Interstate 5 (Caltrans has no record of Interstate 5 overtopping in this area in the 50 years of I-5's existence) to the Sacramento River west of the project as well as filter/infiltrate project runoff (see **General Response 3.11**). The

vegetated swale ends in a wet pond that is designed to attenuate, infiltrate and treat storm water in excess of 100-year flows (i.e. the potential Churn Creek overflow) and recharge the local groundwater. The wet pond is intended to promote increased water quality, not mitigate the quantity of storm water runoff from the site. The stormwater system is designed to infiltrate all project site runoff within the vegetated swale, which would be outside of the 100-year floodplain.

Shasta County standards will not apply to this project if it is placed in trust. However, the stormwater collection, conveyance and infiltration system would be designed to capture and control the 100-year runoff on site by infiltration - the method recently employed on the Shasta County Juvenile Detention Facility expansion. Even though the project will not be subject to the Shasta County Standards, the 100-year recurrence interval used in the analysis exceeds the 25-year design storm required by Shasta County, resulting in a more conservative design.

The base flood in the Sacramento River at the project location is entirely regulated by maximum regulatory release from Shasta Dam which is triggered by unusually high rainfall in the roughly 6,500 square mile tributary basin over the course of weeks or months during the wet season combined with high carryover storage from the previous dry season. No individual storm directly and independently affects flooding on the Sacramento River between Shasta Dam and Clear Creek. Stormwater runoff at the project site is produced by short duration (less than one hour) cloud bursts falling on the site itself. Flooding in Churn Creek results from high precipitation in the entire Churn Creek Basin, roughly 33 square miles, over the course of many hours, also referred to as a stationary convergence event. As described in the "Churn Creek Bottom Flood Risk Reduction Reconnaissance Study, Shasta County" provided by Shasta County, flooding flows in Churn Creek generally occur at times of low flow in the Sacramento River (p.7). There is a vanishingly small probability that 100-year return interval conditions will occur simultaneously at the project site, Churn Creek Bottom, and the Sacramento River adjacent to the project site. Perhaps once in 100,000 years (.01 x .01 x 0.1). So, the effect of Churn Creek overtopping I-5 during 100-year runoff at the project site while the Sacramento River is flooding was not quantitatively considered. Please refer to **Response to Comment A6-17** regarding the "Churn Creek Bottom Flood Risk Reduction Reconnaissance Study, March 7, 2019".

Regarding Section 5.4; The Anderson Site (Alternative E) would require placement of substantial fill in the floodplain of the Tormey Drain and would also be required to detain or retain storm water to maintain Pre-Development flooding conditions downstream of the project. On-site stormwater management would be provided as it was on the adjacent residential development on Oak Street. Flood storage volume lost by placement of engineered fill within the existing floodplain would be offset by equal or greater volume of excavation at the same elevations adjacent to the Tormey Drain. The Anderson site is hydrologically inferior to the Strawberry Fields Site because it is actually in the floodplain while the Strawberry Fields Site is adjacent to and above the floodplain. However, if the Anderson site ultimately becomes the preferred site for other reasons, the grading and drainage system would be designed incorporating a combination of infiltration trenches, infiltration/detention basins and numerous other storm water quality BMPs to encourage groundwater infiltration in order to mitigate storm water runoff levels due to the increased impervious areas while maintaining or increasing the existing surface flood storage volume without increasing downstream flood risk.

Response to Comment A6-09

Please see **General Response 3.6.4** regarding fiscal impacts to local governments.

Response to Comment A6-10

The issue of housing and housing availability was addressed in Draft EIS Section 4.7, and Draft EIS Appendix A. As described therein, the various project alternatives would not have a significant effect on the housing market or housing availability. These analyses have been further fortified by Final EIS Appendix L. Please see Response A-6.10 in Final EIS Appendix L, which specifically addresses the issue of the Carr Fire and the Camp Fire. As described therein, the occurrence of these fires does not alter the less-than-significant impact described in Draft EIS Section 4.7. Please refer to **General Response 3.6.3** regarding the issue of problem gambling.

Response to Comment A6-11

Please see **General Response 3.6.3** regarding the issue of homelessness.

Response to Comment A6-12

Shasta County state attainment status is not relevant to the Proposed Project as the Subject Property would not be subject to state attainment standards once taken into trust. Regardless, analysis of potential emissions of ozone precursors, including nitrogen oxides (NOx) and reactive organic gases (ROGs), from the Proposed Project can be found in Section 4.4 of the Draft EIS. While the emissions resulting from off-site improvements were quantified and presented in the Draft EIS (see Draft EIS Table 4.4-1), the Draft EIS did not compare these emissions to the Shasta County AQMD air quality thresholds. A discussion of Shasta County AQMD air quality thresholds has been added to the Final EIS, Volume II, Section 3.4, and a comparison of the emission of off-site improvements to the Shasta County AQMD air quality thresholds has been added to the Final EIS, Volume II, Section 4.4. As discussed therein, emissions from construction of the proposed off-site improvements would be well below the Shasta County AQMD thresholds of significance.

Response to Comment A6-13

As noted throughout the Draft EIS, once the Strawberry Fields Site is taken into trust, the property would no longer be subject to City and County rules and regulations. Accordingly, compliance with SHAQMD rules is not required. Nevertheless, the Air Quality Best Management Practices, provided in Table 2-2 of the Draft EIS, would be implemented by the Tribe to eliminate or substantially reduce potential air quality impacts from construction and operation of the Proposed Project. No changes to the Draft EIS are warranted.

Response to Comment A6-14

Please see **General Response 3.6.4** regarding fiscal effects and **General Response 3.7.1** pertaining to law enforcement, fire, and EMS. The commenter's statement regarding the subjectivity of crime statistics is acknowledged.

Regarding the risk of drowning for persons walking near the Sacramento River, as depicted in Final EIS Figure 2-8.1, a 150-foot setback is proposed between the Alternative A project improvements and the riverbank. See Final EIS Section 2.0 for further details regarding this setback. Because of the setback element, Alternative A does not contemplate project patrons walking along or near the edge of the river. Consequently, the risk of drowning for casino patrons is much less than it would be in the absence of this setback. Although it would be possible for a casino patron to drown in the context of Alternative A, such risks would not be any greater than, and may be less than, risks at many other locations along the Sacramento River that are potentially accessible. Regardless, a BMP has been added to Final EIS Volume II Table 2-2 that states: "Signage shall be installed noting that the areas near the Sacramento River are off limits due to falling and drowning hazards."

Response to Comment A6-15

Comment noted. Changes have been made to Section 4.10.1, Fire Protection and Emergency Medical Services - Operation.

Response to Comment A6-16

Please see **General Response 3.6.3** regarding local socioeconomic effects, including crime, problem gambling and addiction. Subsequent to the publication of the Draft EIS, the Tribe and the County entered into an IGA that includes stipulations regarding payments to the County for the provision of law enforcement (see Final EIS Section 1.5.4 and **Appendix R**). The recuring payments for law enforcement services is in consideration of the Shasta County Sheriff's Office providing law enforcement services to the Strawberry Fields Site, and the potential for related impacts to the District Attorney, Public Defender, and Probation.

Response to Comment A6-17

The list of potential solutions to perennial Churn Creek Bottom flooding as described in "Churn Creek Bottom Flood Risk Reduction Reconnaissance Study, March 7, 2019" (the Study) includes development of a bypass structure from Churn Creek to the Sacramento River that would cross the Strawberry Fields Site. The bypass structure is one of five alternatives addressed in the Reconnaissance Study.

The bypass structure, if ever implemented, would not be precluded by the construction of Alternatives A-D. If the proposed bypass structure project ever moves forward, Shasta County staff would need to come to terms with the owner of the Strawberry Fields property in order to install bypass infrastructure across their project site, just as they would need to do with Caltrans and all other private property owners that would be impacted by a bypass structure. All the project alternatives on the Strawberry Fields Site could accommodate bypass infrastructure south of the proposed development.

COMMENT LETTER A7: SHASTA REGIONAL TRANSPORTATION AGENCY

Response to Comment A7-01

Comment noted. The SRTA's Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) is available and provides a 20-year vision of transportation improvements.

Response to Comment A7-02

Please see TIS Page 5 (Study Methodology) and Page 36 (Baseline Conditions), for a thorough explanation of the analysis scenarios' data sources. As noted under the Cumulative (2040) Conditions, volumes for the intersections that do not overlap with the 2017 *River Crossing Marketplace Specific Plan Traffic Impact Analysis Report* "were developed using the Shasta County Regional Travel Demand Model (SCRTDM)." As documented therein, Version 1.1 of the SCRTDM was employed. As further noted in the accompanying footnote, and as agreed upon by the City, these volumes from the SCRTDM were obtained from the Omni-Means Interstate-5/South Bonnyview Interchange PSR. The commenter is directed to the City's Interstate-5/South Bonnyview Interchange PSR documentation for additional information.

Response to Comment A7-03

Please see **Response to Comment A4-22** regarding the Shasta County *Go Shasta Regional Active Transportation Plan***.**

COMMENT LETTER A8: DEPARTMENT OF TRANSPORTATION

Response to Comment A8-01

Regarding the commenter's statement regarding future improvements, it is important to note that the Bonnyview Interchange (Exit 675) Improvements Project Study Report – Project Development Support (PSR-PDS) Preferred Alternative (diverging diamond interchange with roundabouts) was identified early in the TIS scoping process and was used as the ultimate configuration at the South Bonnyview/Churn Creek Road/Interstate 5 interchange. As a result, the Year 2025 and Cumulative mitigation improvements are incremental components of this longer-term geometric solution. Thus, all future improvements are consistent with the PSR-PDS. As per the *River Crossing Marketplace Specific Plan EIR*, "Under the Year 2040 with Rancheria plus Project scenario…cumulative impacts at intersection #5 [South Bonnyview Road/Bechelli Lane] would be mitigated with implementation of Mitigation Measure TRANS-1.1 [Reconstruct the intersection and approaches into a four-leg, two-lane roundabout in accordance with the specifications of the City Engineer]." The City provided improvement plans for the construction of South Bonnyview Road improvements at Bechelli Lane and the I-5 interchange ramps, the combination of which are understood to be representative of the aforementioned "TRANS-1.1." These improvements have been fully constructed and the facilities were opened to traffic in November 2022. Accordingly, the project has no mitigation responsibility at this intersection and the Updated TIS reflects these changes. Please see **Response to Comment A4-02** for further information.

Response to Comment A8-02

Please note that the Existing (2016) Conditions evaluated as part of the TIS (Draft EIS Appendix F) and the Updated TIS represent current traffic counts, existing roadway geometry/traffic control, and existing development conditions at the time of data collection. These two Caltrans projects (widening Interstate-5 to 6-lanes and widening the northbound on-ramp at the South Bonnyview Road interchange) have been recently completed, with completion years of 2022 and 2019, respectively. Consequently, it was not appropriate to include them in the 2016 baseline conditions. Nevertheless, these improvements are reflected in the future years' analysis scenarios of 2025 and 2040 that are documented in the Updated TIS. As per the *River Crossing Marketplace Specific Plan EIR*, "Under the Year 2040 with Rancheria plus Project scenario…cumulative impacts at intersection #5 [South Bonnyview Road/Bechelli Lane] would be mitigated with implementation of Mitigation Measure TRANS-1.1 [Reconstruct the intersection and approaches into a four-leg, two-lane roundabout in accordance with the specifications of the City Engineer]." The City provided improvement plans for the construction of South Bonnyview Road improvements at Bechelli Lane and the I-5 interchange ramps, the combination of which are understood to be representative of the aforementioned "TRANS-1.1." These improvements have been fully constructed and the facilities were opened to traffic in November 2022. Please see **Response to Comment A4-02** for further information.

Response to Comment A8-03

As the commenter notes, the proposed improvements to Bechelli Lane and new access roadways would include sidewalks and/or shoulders with adequate width to accommodate bicyclists. In addition, as described in Final EIS Section 2.3.2, the Tribe would implement Best Management Practices (BMPs), such as carpools, to reduce employee and patron automobile trips. The Tribe's commitment to working with local transportation agencies to facilitate mass transit is also acknowledged.

Response to Comment A8-04

The outdoor amphitheater has been removed from the Proposed Project description included in the Draft EIS. Also, the Final EIS has been updated to include the option (Onsite Services Option 2) of a Public Safety Building on the Strawberry Fields Site. The Public Safety Building would be comprised of a police substation and fire and emergency services, and is anticipated to employ approximately seven persons, who would staff the facility at staggered times each day. Due to its limited, focused operations, any trips generated by this facility are anticipated to be nominal and dispersed throughout the day, rather than concentrated during one of the peak-hours.

As noted in Table 2-1 of the Draft EIS, the Proposed Project includes an 1,800-seat Event Center. Trip generation rates for the proposed event center were based on a previous study of a similar facility at the Cache Creek Casino. Although the location of the gaming facility influences the trip generation characteristics, the interaction between the casino and the event facilities at the Cache Creek Casino and the Proposed Project is reasonably anticipated to be consistent. This is considered to be an accurate approach to approximating the interaction of facility uses as it is based on actual patron data at a similar facility.

The previous Cache Creek Casino study considered the top sixteen drawing events which occurred on Fridays or Saturdays over the course of a twelve-month period. Ticket counts for each event, along with person counts via automatic counters at the multiple entrances to the event facility, were used to estimate the proportion of patrons arriving from outside and within the casino resort. More specifically, for each day included in the sample, daily patron counts from the automatic counters were used to calculate an average total daily patron count on event days. Of the sixteen samples, the average number of attendees at the event center was then compared to the average facility patron count from a sampling of the most recent non-event days. If people attending the events did not participate in gaming activities during their same visit, the increase in the daily patron count on event days would be equal to the average attendance at the events considered. However, the actual difference in person counts visiting the facility as a whole on event days versus non-event days was several hundred people. Using this data, it was possible to reasonably to conclude that approximately 70-percent of the event center would have visited the facility even without an event. As a result, the remaining 30-percent of the patrons represents new trips that would not be expected to occur without the event venue.

See the "Event Center Trip Generation" Section of the Updated Traffic Study for additional information.

Response to Comment A8-05

As documented, the TIS (Draft EIS Appendix F) and the Updated TIS (Final EIS Appendix Q) estimated Existing (2016), Opening Year (2025), and Cumulative (2040) Conditions. Consistent with Comment A8-1, "the current and future needs of the transportation system and the affected Interstate-5 freeway interchange are addressed in the 'Bonnyview Interchange (Exit 675) Improvements Project Study Report – Project Development Support' (PSR_PDS Preferred Alternative 4B) prepared by the City for Caltrans…All future improvements to the interchange must be consistent with the study unless demonstrated to be equivalent or superior to the study results." Consistent with this expectation, as noted on TIS Page 5 (Study Methodology) and Page 36 (Baseline Conditions), the Cumulative (2040) Conditions volumes for the intersections that do not overlap with the 2017 River Crossing Marketplace Specific Plan Traffic Impact Analysis Report "were developed using the Shasta County Regional Travel Demand Model (SCRTDM)." As further noted in the accompanying footnote, and as agreed upon by the City, these volumes from the SCRTDM were obtained from the Omni-Means Interstate-5/South Bonnyview Interchange PSR. In summary, the TIS methodology to forecasting traffic volumes is consistent with the City's expectation that the study methodology be consistent with the interchange PSR.

Response to Comment A8-06

Comment noted. It is not uncommon for the details of the Proposed Project to differ from the macroscopic estimates commonly prepared for programmatic or high-level planning purposes. There are numerous reasons that traffic flow estimates in traffic impact studies may differ, including the use of different models, slightly different base period assumptions and various assumptions regarding the distribution of trips during each day. There are additional factors that can lead to different estimates.

Response to Comment A8-07

A significant factor that contributed to the assignment of trips in the TIS and Updated TIS to the "northern" and "southern" access points under Site Access Option 2 (North and South Access) was the visibility of the project site from the perspective of patrons travelling on Interstate 5. While the assignment of these trips in the TIS is somewhat subjective, it is reasonable to anticipate that the majority of the patrons, both through the use of personal navigation systems and purely drive-by visibility, would exit Interstate-5 at the location closest to the project site. This reasonable logic is supportive of the trip assignment assumptions included in the TIS and Updated TIS, in which the proportion of the northbound site trips that use South Bonnyview Road is greater than the proportion suggested by the commenter. We respectfully suggest that the commenter may not have fully considered this factor, which is especially relevant for non-local patrons who are not familiar with the local roadways. This logic is also consistent with the trip assignment used under Site Access Option 3 (South Access Only) under which all site traffic is routed through the Smith Road interchange. Also, it is important to note that "northbound State Route-273" traffic is consistent across the three access conditions. These patrons are assumed to be unaffected by the various access conditions along Interstate-5 and are assumed to access the site via South Bonnyview Road.

Response to Comment A8-08

The additional facilities noted have been incorporated and are thoroughly evaluated in the Updated Traffic Study. Please see **Response to Comment A6-06** regarding the additional facilities analyzed in the Updated Traffic Study.

Response to Comment A8-09

Comment noted. The majority of the property required to achieve the suggested frontage road system along the west side of Interstate 5 connecting from Knighton Road to South Bonnyview Road is private and, therefore, not within the Tribe's control. Because of the lack of certainty regarding feasibility, this access option was not evaluated in the TIS or Updated TIS. Please see **Response to Comment A4-23** for additional information regarding the implementation of off-site mitigation improvements.

Response to Comment A8-10

Our understanding is that, due to right-of-way constraints, the proposed I-5 interchange with Smith Road is a Type L-2 (Spread Diamond) on the eastern side and a Type L-7 (NB Loop On- Ramp) on the western side. The proximity of existing properties in the southwestern quadrant of the proposed Smith Road interchange is the primary limiting factor precluding the construction of diamond ramps in all four quadrants. As a result, the turning movements reflected throughout the TIS (Draft EIS Appendix F) and the Updated TIS for Intersection #25 have been confirmed to be both appropriate and accurate. For example, the anticipated traffic flows are depicted in Figure 25 of the Updated TIS.

Response to Comment A8-11

As noted by the commenter, the project site includes on-site parking for RVs. In addition to these vehicles and separate from construction activities, occasional large trucks are reasonably anticipated to serve the variety of events. The analysis of the Bonnyview Road area (Intersections #3-#7) has thoroughly accounted for the forecasted volumes, both passenger vehicles and RVs/trucks, added to both the existing geometrics and the future interchange layout. Access to the project site, regardless which of the three access options are selected, is reasonably anticipated to be designed and constructed in a manner consistent with geometric standards. As such, all site access facilities will be able to accommodate the anticipated vehicles. Please see **Response to Comment A4-23** for additional information regarding the implementation of off-site mitigation improvements.

Section 4.8.2 of the Draft and Final EIS includes a discussion pertaining to construction activities. As described therein, construction trips would primarily utilize I-5 as a regional route to access South Bonnyview Avenue, from which traffic would turn onto Bechelli Lane. Because these roadway segments are all expected to operate at acceptable LOS during the buildout year with project traffic (refer to analysis in Final EIS Section 4.8.2), the addition of traffic associated with the construction of Alternative A would not result in significant impacts. However, preparation of a traffic management plan is included in Final EIS Section 5.8 to further ensure trips associated with construction do not contribute to unacceptable roadway conditions.

Response to Comment A8-12

Comment noted. Traffic volume adjustments were made to account for the changes to years of assessment in the Updated TIS (Final EIS Appendix Q).

The full development of the California Gold project site was accounted for in the development of the 2040 volumes. Since 2025 volumes were linearly interpolated using the 2040 volumes, partial development of the California Gold project site is inherently included in the 2025 volumes. Thus the volumes associated with the California Gold project site were not excluded from the 2025 (Te) volume used in the fair share percentage calculations.

Please see **Response to Comment A8-04** regarding amphitheater traffic volume.

TIS Table 16, note 5 explains that the 672 people is "based on an average of 15 SF per attendee, which is consistent with industry best practices for conference/event space planning (10,080 SF / 15 = 672 people)." Please see **Response to Comment A4-02**, and the Updated TIS, for additional explanation of the trip generation calculations and assumptions.

A fair share percentage calculation summary has been prepared and is included as part of Appendix J of the Updated TIS (Final EIS Appendix Q).

Cumulative (2040) Conditions for the Bonnyview Road interchange area (Intersections #3-7) were analyzed using Vissim rather than Synchro. The associated Vissim output information is provided in Appendix E (baseline) and Appendix I (plus project) of the Updated TIS (Final EIS Appendix Q).

The omission of a roundabout option for mitigation at the intersection of North Street and Oak Street at the Anderson Site was a typographical error in the Draft EIS. See updated text in Final EIS Section 5.8, which now includes the roundabout option.

COMMENT LETTER A9: CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Response to Comment A9-01

Comment noted. Please refer to **Response to Comments A9-02** through **A9-12** below.

Response to Comment A9-02

The project site would be acquired in federal trust for the Tribe prior to construction of the Project, and therefore revegetation would not be directly subject to state regulation or review; however, as stated in Mitigation Measure 5.2A, the Tribe will be required to complete revegetation as a condition of the NPDES General Construction Permit that would be obtained from the EPA. Although not required, the Tribe may voluntarily elect to provide a copy of the revegetation plan to the CDFW for review.

Response to Comment A9-03

The recommendation of conducting nesting bird surveys 7 days instead of 14 days prior to the start of construction has been incorporated into Final EIS Mitigation Measure 5.5.2 N.

Response to Comment A9-04

Mitigation Measure 5.5.2 O. was revised to clarify "…and in consultation with the USFWS." As the project site would be held in federal trust prior to initiating construction, nesting bird buffers would be implemented pursuant to federal agency recommendations.

Response to Comment A9-05

As described in **General Response 3.11** and the updated text in Final EIS Section 2.3.2, the streambank stabilization measures have been revised from those described in the Draft EIS, and now emphasize live native vegetation and existing native materials, in lieu of the importation and placement of boulders described in the Draft EIS. Because this revise technique will rely upon native material and not alter the topography of the existing riverbank, it would have a reduced potential impact on animal species (including bank swallows and fish species) than the stabilization measures described in the Draft EIS. Also see **General Response 3.12.1** and **3.12.2** regarding potential effects to special-status species and habitat, including bank swallows and certain fish species.

Response to Comment A9-06

The project area is located adjacent to a densely populated city and is bordered by rural residential development to the north and south, a major highway to the east, and the Sacramento River to the west. These features currently limit wildlife movement through the project site. The recommended wildlife

movement study using cameras would be unlikely to capture movement of smaller wildlife species of concern identified for the area, particularly amphibian species. However, it is acknowledged that some movement of wildlife occurs through the site., The majority of the project site's habitat (196 acres under Option 1 for both Water Supply /Wastewater and Public Safety and 160 acres under Option 2 for Water Supply / Wastewater and Public Safety) would be avoided through project design and left available for wildlife movement. Please also refer to **Response to Comment A9-02** and **General Response 3.12.2** for more information on potential effects to habitats and wildlife.

Response to Comment A9-07

Please see **Response to Comment A9-05** regarding revisions to the streambank stabilization measures to reduce potential impacts. Please also see **General Response 3.12.1** and **3.12.2** regarding potential effects to special-status species and habitat, including bank swallows and certain fish species.

Response to Comment A9-08

Red Bluff dwarf rush was not been observed on the Strawberry Fields Site during multiple surveys conducted in the months of March, April, May, and June, which comprise the entire bloom season for the species. Surveys have not identified the species on the project site during any month of its bloom season; therefore, it does not have the potential to occur on the project site, and the Final EIS has been revised accordingly. Additionally, because the project site would be held in federal trust at the time of preconstruction surveys, state and local agencies and regulations would no longer apply to the proposed project and project site.

Response to Comment A9-09

The western spadefoot toad is a State-listed species of special concern. The EIS was prepared pursuant to NEPA, and the project site would be held in federal trust prior to initiating construction of the Proposed Project. Therefore, surveys and mitigation would be implemented pursuant to federal agency requirements; CEQA requirements, state and local agency requirements, and state and local conservancies and easements would not apply. Mitigation Measure **5.5.1 I** has been revised to clarify that additional exclusionary silt fencing will be installed around the perimeter of construction after surveys have been completed to further protect the species from construction impacts, should it be present.

Response to Comment A9-10

According to CNDDB, the nearest record for pallid bat was identified in 1927 approximately 6.8 miles east of the Anderson Site. The Biological Resource Assessment (Final EIS Appendix O-3) evaluated the project site for suitable habitat that could support pallid bat, and concluded that while suitable foraging habitat for pallid bat may be present, suitable roosting habitat for the species does not occur. Additionally, Mitigation Measure **5.5.1 M** includes additional updated surveys that would also identify whether suitable roosting habitat for any tree-roosting bats is present on site.

Response to Comment A9-11

Please see **Response to Comment A9-06**.

Response to Comment A9-12

Please refer to **General Response 3.13.2** regarding lighting and glare. As noted therein, all project designs were evaluated in consultation with the USFWS and NMFS (Draft EIS Appendix D and Final EIS Appendix O-1). As described in the Draft EIS, project activities were determined to be unlikely to affect wildlife (including listed fish species), with the inclusion of the design features described in Draft EIS Section 2.3.2 under "Architecture, Signage, Lighting, and Landscaping," detailing the type of glass and lighting to be used.

COMMENT LETTER A10: CALIFORNIA STATE LANDS COMMISSION

Response to Comment A10-01

The Commission's statements regarding its jurisdiction are noted.

Response to Comment A10-02

See **Response to Comment A10-03** regarding the revised streambank stabilization measures. As described in the updated Final EIS Section 2.3.2, bio-technical stabilization would be implemented within the cobbly portion of the riverbank and would include establishment of willows from above the ordinary high-water line inland to the toe of the nearly vertical loam bank. As all work, including the plantings of willows and other native trees for streambank stabilization, would occur above the ordinary high-water mark of the Sacramento, it would also be outside of the ordinary low-water mark and, therefore, outside of the jurisdiction of the State Lands Commission.

Response to Comment A10-03

As described in **General Response 3.11** and the updated text in Final EIS Section 2.3.2, the streambank stabilization measures have been revised from those described in the Draft EIS, and now emphasize live native vegetation and existing native materials, in lieu of the importation and placement of boulders described in the Draft EIS. The project would not disturb the existing vertical loam bank and would include establishing riparian trees in the setback area between the existing riverbank and the proposed hardscape features of the project. This would stabilize and reduce the meander potential within the mantle of loamy soil while preserving the existing cut bank and natural river processes.

Response to Comment A10-04

Comment noted. The BIA will send copies of future project-related documents, including electronic copies of the Final EIS, Mitigation Monitoring and Reporting Program, and Record of Decision to the Commission once they become available.

COMMENT LETTER A11: CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

Response to Comment A11-01

Comment noted. The Central Valley Water Board has provided comments on the Draft EIS.

Response to Comment A11-02

The comment is noted. While records indicate that the Clear Creek Wastewater Treatment Plant has available capacity to serve the proposed development, connection to the City of Redding's system would be subject to the ability of the system to accommodate the additional flows and continue to meet Waste Discharge Requirements and National Pollution Discharge Elimination System (NPDES) Permit conditions. Additionally, as noted in Draft EIS Table 1-1, the City of Redding would have approval over connection to its wastewater system.

Response to Comment A11-03

The comment is noted. While records indicate that the Anderson Water Pollution Control Plant has available capacity to serve the proposed development, connection to the City of Anderson's system would be subject to the ability of the system to accommodate the additional flows and continue to meet Waste Discharge Requirements and NPDES Permit conditions. Additionally, as noted in Draft EIS Table 1-1, the City of Anderson would have approval over connection to its wastewater system.

Response to Comment A11-04

Section 5.3.1 of Final EIS Appendix M identifies the expected effluent constituent levels. The proposed MBR facility is expected to produce an effluent with a total nitrogen concentration less than 10 mg/L, which is the Safe Drinking Water Act maximum contaminant level for nitrate (as nitrogen). Disposal of the highly treated effluent is not expected to result in groundwater exceeding primary drinking water standards.

As described in Final EIS Appendix M, Section 3.3.2, after publication of the Draft EIS, site specific geotechnical exploration and testing was completed at the site of Alternatives A-D by Blackburn Consulting (included in Final EIS Appendix M). Percolation tests were performed in several locations across the proposed leach field area and were used to determine the average hydraulic loading rate. The percolation tests conclude that only two of the fifteen test locations fall outside the standard range for "usable disposal material" according to the UIC Program. Furthermore, Shasta County's LAMP for OWTS specifies a minimum depth to groundwater based on percolation rates. Based on the demonstrated percolation results, the required minimum depth to groundwater is 5 feet. As provided by Blackburn's test pit logs, the average depth to groundwater is more than 12 feet, which complies with Shasta County Standards. The sizing of the proposed leach field area accounts for Blackburn's site exploration results and is designed to comply with both Shasta County and USEPA's standards for leach field design.

Response to Comment A11-05

The Wastewater Management and Drinking Water Feasibility Study included as Final EIS Appendix M has been updated to address and ensure compliance with the Shasta County's 2018 Local Agency Management Program (LAMP) for Onsite Wastewater Treatment Systems (OWTS).

Response to Comment A11-06

As identified in Section 5.2 of the EIS, construction of the proposed facilities would be required to comply with NPDES General Construction Permit. A Stormwater Pollution Prevention Plan would be implemented throughout the construction process.

As described in Section 4.3.1 of the EIS, low impact design BMPs have been incorporated into the site plan. All stormwater runoff from the development area would be infiltrated on the site and would not discharge to the Sacramento River. As described in Final EIS Appendix N, the development would use catch basin filters, infiltration trenches and vegetated swales to filter stormwater and remove sediment and contaminants.

Response to Comment A11-07

Please see **General Response 3.11** regarding impacts to waters of the U.S., as well as **General Response 3.12.2** regarding potential effects to habitat.

COMMENT LETTER T1: PASKENTA BAND OF NOMLAKI INDIANS

Response to Comment T1-01

Please refer to **General Response 3.1.1** regarding extension of the Draft EIS comment period. In addition, it is noted that the Paskenta Band subsequently submitted a substantive and extensive comment letter dated June 17, 2019, which is included herein and labelled as Comment Letter T6. Please see **Response to Comments T6-01** through **T6-101** for responses to the Paskenta Band's comment letter dated June 17, 2019.

COMMENT LETTER T2: WINTU TRIBE OF NORTHERN CALIFORNIA

Response to Comment T2-01

Please refer to **General Response 3.1.1** regarding extension of the Draft EIS comment period. In addition, it is noted that the Wintu Tribe of Northern California subsequently submitted a comment letter dated June 17, 2019, which is included herein and labelled as Comment Letter T4. Please see **Response to Comments T4-01** through **T4-03** for responses to the Wintu Tribe of Northern California's comment letter dated June 17, 2019.

COMMENT LETTER T3: NOR REL MUK WINTU NATION

Response to Comment T3-01

Please refer to **General Response 3.1.1** regarding extension of the Draft EIS comment period.

COMMENT LETTER T4: WINTU TRIBE OF NORTHERN CALIFORNIA

Response to Comment T4-01

Archaeological investigations at CA-SHA-266, the ethnographic village of *Yonotumnosona*, have been ongoing since the 1940s as part of more than ten amateur, commercial construction, and roadway projects. The most recent formal investigation by Vaughan (2000) suggested that further work analyzing the cultural deposits is unnecessary as all excavations have clearly indicated that CA-SHA-266 is associated with the Shasta Complex, the most recent and most well understood cultural association in the Redding region. However, in 2002, Vaughan was again involved at CA-SHA-266 when five burials were discovered during construction of the Hilton Garden Inn parking lot. Mitigation Measure 5.6 C. requires that a team of archaeologists and Native Americans monitor any ground-disturbing activities within soils that have the potential to yield cultural resources; the monitoring team will also provide construction worker awareness training.

In a 2019 report, Theodoratus and McBride present information regarding a series of six village sites along the eastern bank of the Sacramento River; the northernmost village is *Yonotŭmnomsono*, or CA-SHA-266. Theodoratus and McBride suggest that the next two villages to the south are located within the APE; these are *Ke nkodi* and *Nosono*. Examination of the site record form for the first village, *Ke nkodi* (CA-SHA-268), indicates that the site is located north of the Proposed Project construction footprint; further, the Extended Phase I trenching program, which included the northern end of Strawberry Fields, failed to uncover archaeological resources at the north end of the property, indicating that CA-SHA-268 would remain unaffected by project construction. In the event that elements of CA-SHA-268 are uncovered during construction, Mitigation Measure 5.6 D. would be implemented.

The second site that Theodoratus and McBride identify as within the APE is *Nosono* (no site number). Their map indicating site locations is very rough, making it difficult to confirm. *Nosono* may be in the project footprint or may be located west of any potential construction impacts. Again, if elements of any archaeological site are uncovered by construction, mitigation measures in the Final EIS would dictate identification, assessment, and treatment methods.

The archaeological investigation, both an Expanded Phase I backhoe trenching program and a Phase II testing and evaluation program focused on the potential archaeological sites within the Proposed Project construction footprint. Mitigation measures have been added to the Final EIS that include construction monitoring by a team of archaeologists and Native Americans (Mitigation Measure 5.6 C.) and the preparation of an Unanticipated Discoveries Plan to address discoveries made during construction, including new archaeological sites, features or burials associated with known archaeological sites (Mitigation Measure 5.6 A.).

Response to Comment T4-02

The commenter is correct in that SHPO consultation is required for compliance with Section 106 of the NHPA. Section 4.6 of the Final EIS has been updated to summarize the results of consultation. As stated therein, in a letter dated May 9, 2023, the SHPO concurred with the BIA's finding that the Proposed

Action will result in "no historic properties affected" (refer to Final EIS Appendix P). The BIA also invited the Paskenta Band to participate in a consultation process, but did not receive a response.

Requests from the Wintu Tribe to monitor the Phase II testing and evaluation program, were received. However the Phase II excavation had been completed by the time such requests were received. See Draft EIS Appendix E – Cultural Resources Consultation.

The Redding Rancheria monitors did not dismiss CA-SHA-4413's cultural significance. Rather, the consultation was regarding NRHP eligibility, a determination which was made based on all eligibility criteria (refer to Draft EIS, Section 3.6.1), including the extent to which the resource had yielded or would likely yield information important in history or prehistory (Criterion D). Consultation between Redding Rancheria and the BIA led to the conclusion that CA-SHA-4413 did not include data values which would make it eligible for the NRHP, as the identified features are duplicated at nearby sites; those nearby sites include additional site components such as midden (while CA-SHA-4413 does not). Further, all evidence recovered from CA-SHA-4413 so far indicates that the site dates to the Shasta Complex, which is the most common archaeological manifestation in the region; the data from CA-SHA-4413 does not appear to contain new information that can be used to reinterpret Shasta Complex chronology, technology, or subsistence practices. SHPO concurred with the finding that CA-SHA-1433 was not eligible for the NRHP in its letter dated May 9, 2023 (refer to Final EIS Appendix P). However, to allow for the possibility that this could change, Draft EIS Mitigation Measure 5.6 A. (renumbered as Final EIS Mitigation Measure 5.6 D.) contains provisions for a reassessment of CA-SHA-4413 eligibility should additional features be discovered during construction.

Response to Comment T4-03

Mitigation measures have been added (see Final EIS Mitigation Measures 5.6 A, B, and C) requiring development of a Treatment Plan, for archaeological and tribal monitors to be present during earth-moving activities where there is potential to uncover cultural resources, and for a worker awareness training program.

Project consultation is under the purview of the BIA; the BIA is in receipt of the Wintu Tribe's comments regarding the Proposed Project's need for consultation, however the BIA only consults with federally recognized tribes when fulfilling the requirements of NHPA.

COMMENT LETTER T5: REDDING RANCHERIA

Response to Comment T5-01

The Commenter expresses support for the Proposed Project, provides clarifications regarding certain analyses in the Draft EIS and makes recommendations for edits to some sections of the Draft EIS.

Response to Comment T5-02

The Tribe's commitment to best management practices (BMPs) and mitigation measures is acknowledged.

Response to Comment T5-03

The Tribe's commitment to working with the County and the City is acknowledged.

Response to Comment T5-04

The Tribe's commitment to working with the County Sheriff's Office is acknowledged. The Tribe's statements regarding the source of law enforcement calls for service are also acknowledged. Please see **General Response 3.6.3** regarding law enforcement and **Response to Comment A6-03** regarding fiscal effects.

Response to Comment T5-05

Please see **General Response 3.5** regarding the range of alternatives analyzed in the Draft EIS. A table within **General Response 3.5.4** includes a list of parcels owned by the Tribe, including which parcels are owned in fee and which are held in trust. This table clarifies the status of the various parcels that comprise Alternative F, as well as parcels owned by the Tribe that are adjacent to or in the vicinity of Alternative F.

Response to Comment T5-06

The commenter is correct that the "cumulative" climate change impacts analyzed in the Draft EIS are intended to include "direct and "indirect" effects, and not only the incremental cumulative effects that are in addition to such direct and indirect impacts.

Response to Comment T5-07

Comment noted, this is consistent with the Final EIS Section 4.4.1. Consideration of the applicability of Tribal New Source Review permitting was based on estimated project related emissions from stationary sources rather than other source categories. It should be noted that while the Final EIS estimated the actual emissions from stationary sources, including emergency diesel generators, the Tribe will be required by the Clean Air Act to consult with the USEPA to determine whether NSR permits may be needed based on regulatory procedures for hypothetical usage and associated emissions.

Response to Comment T5-08

The historical, cultural and paleontological information provided by the Tribe is acknowledged.

Response to Comment T5-09

The Tribe's commitment to the community, to the environment and its efforts to foster positive intertribal relations with its tribal neighbors are acknowledged.

Response to Comment T5-10

Please see **Response to Comment T4-01** regarding the archaeological site known as CA-SHA-268.

Response to Comment T5-11

Please see **Response to Comment T5-08**.

Response to Comment T5-12

See **Response to Comment T5-09**.

COMMENT LETTER T6: PASKENTA BAND OF NOMLAKI INDIANS

Response to Comment T6-01

Please see **General Response 3.6.1** regarding the anticipated competitive effects on the Paskenta Band's Rolling Hills Casino EBITDA (earnings before interest, taxes and depreciation) margin. Also see Final EIS **Appendix L.**

Response to Comment T6-02

Archaeological site CA-SHA-4413 was evaluated for the four criteria of eligibility and was recommended to be ineligible for listing on the National Register of Historic Places. Because the physical site could not be linked to specific events or individuals significant in the past (Criteria A and B), it does not include distinguishable architectural values (Criterion C), and the data available did not appear to include new information that would change current understanding of that period in history (Criterion D). No data recovered from CA-SHA-4413 appears to be associated specifically with the 1846 massacre. The dates associated with the site, as determined by radiocarbon dating and projectile point typology, point to a period of occupation from approximately 750 A.D. to 1060 A.D., long before the 1846 massacre.

Response to Comment T6-03

Comment acknowledged. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS.

Response to Comment T6-04

Please refer to **General Response 3.1.1** regarding extension of the Draft EIS comment period.

Response to Comment T6-05

NEPA does not require that an EIS "summarize" the information described in 40 CFR §1502.16 and Section 8.4.8 of the 2012 BIA NEPA Guidebook.[5] 40 CFR §1502.10 provides a "recommended format" for agencies to use when they prepare an EIS, "unless the agency determines that there is a more effective format for communication". 40 CFR §1502.11 through 1502.19 then describes the contents of each paragraph in the recommended format. 40 CFR §1502.16 and Section 8.4.8 of the 2012 BIA NEPA Guidebook outline information that should be discussed within the environmental consequences section of an EIS. The following response addresses the commenter's requests. Responses use the same numbering sequence that was used by the commenter:

1. While the EIS discusses in detail the environmental consequences of the project alternatives, no adverse effects that cannot be avoided were identified, as evidenced in the discussion in Section 4.0 of the Draft EIS, as well as the Executive Summary. The mitigation measures listed in Draft EIS Section 5.0 would reduce significant impacts to less than significant levels.

2. The relationship between short-term uses of the human environment and the maintenance and enhancement of long-term productivity are analyzed in Draft EIS Section 4.0 in the context of those environmental areas that are affected. For example, short-term socioeconomic impacts arising from the construction of project improvements are analyzed in the context of longer-term operational effects. Additionally, Section 2.11.2 of the Draft EIS, Comparison of Environmental and Economic Consequences, discussed the long-term benefits of the project alternatives in light of the short-term environmental consequences associated with construction activities. 40 CFR 1502.16 notes that the discussion in the environmental consequences section of an EIS should not duplicate discussions in the alternatives chapter. The BIA has determined that the current format of the EIS is the most effective means of communication of these issues.

3. Irreversible and irretrievable commitments of resources are analyzed in Draft EIS Section 4.0 in the context of those environmental areas that are affected. For example, the Draft EIS describes the permanent conversion of habitat types (Draft EIS Section 4.5), conversion of farmland (Draft EIS Section 4.9), waste generated during construction and operation (Draft EIS Section 4.10), energy usage (Draft EIS Section 4.10), and the cumulative effects associated with climate change as a result of energy consumption and vehicle travel (Draft EIS Section 4.15).

4. Possible conflicts in land use are analyzed in Draft EIS Section 4.9 and, as warranted, elsewhere in Draft EIS Section 4.0.

5. Energy requirements are analyzed in Draft EIS Section 4.10 in terms of effects to public services, and the effects associated with climate change from energy usage are analyzed in the Draft EIS Section 4.15. Conservation and mitigation measures are described in Draft EIS Sections 2.3.2 and 5.10.5.

[5] Source: Indian Affairs National Environmental Policy Act (NEPA) Guidebook, 59 IAM 3-H, dated August 2012, accessed online October 1, 2019 at: https://www.bia.gov/sites/bia.gov/files/assets/public/raca/handbook/pdf/59_IAM_3-H_v1.1_508_OIMT.pdf

6. Natural or depletable resource requirements and conservation potential of alternatives and mitigation measures are analyzed in Draft EIS Section 4.0 in the context of those environmental areas that are affected. For example, the Draft EIS describes both the conversion and conservation of various habitat types from the project alternatives (Draft EIS Section 4.5), and conversion of farmland (Draft EIS Section 4.9).

7. The design of the built (manmade infrastructure) environment is described and analyzed in Draft EIS Sections 2.0, 4.9, 4.10 and 4.13. The reuse and conservation potential of alternatives and mitigation measures are analyzed in Draft EIS Sections 4.0 and 5.0 in the context of those environmental areas that are affected. For example, the Draft EIS describes both the conversion and conservation of various habitat types from the project alternatives (Draft EIS Section 4.5), and conversion of farmland (Draft EIS Section 4.9).

Response to Comment T6-06

40 CFR §1502.10 provides a "recommended format" for agencies to use when they prepare an EIS, "unless the agency determines that there is a more effective format for communication". 40 CFR §1502.11 then describes the recommended EIS cover sheet. The Draft EIS Notice of Availability (NOA) included all of the elements of the recommended cover sheet described in 40 CFR §1502.11, with the exception of the cost of the EIS which was printed on the Draft EIS cover page. The NOA was determined by the BIA to be the most effective format for communication of the information outlined in 40 CFR §1502.11.

Response to Comment T6-07

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0. See **General Response 3.2.2** regarding why the BIA has the statutory authority to take lands into trust in this circumstance.

Response to Comment T6-08

See **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS, including the Tribe's temporal connection to the Strawberry Fields Site.

Response to Comment T6-09

The issue of the Tribe's legitimacy and connection to the vicinity are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS.

As described in Draft EIS Section 1.3, the Tribe's recognition was restored on June 11, 1984. Also, the commenter's statement that the Strawberry Fields Site is not "in the vicinity" of the Tribe's current reservation does not seem reasonable, given that the two sites are approximately two miles apart as the crow flies.

Response to Comment T6-10

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0.

Response to Comment T6-11

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. At this time, the BIA has not received a fee-to-trust application from the Tribe for the Anderson Site.

Response to Comment T6-12

Please see **General Responses 3.2.2 and 3.5.4** and Final EIS Section 2.10.8 for more information on the Lowery Site. The specific regulation cited by the commenter appears to address Indian Reorganization Act procedures rather than NEPA.

Response to Comment T6-13

Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please see **General Response 3.5.3** regarding a substantive discussion of project alternatives. As described therein, Alternative A represents the most economically viable alternative. It is not uncommon for federally recognized tribes to update or expand their gaming activities as their populations (and the needs of their populations) grow and market dynamics change.

Regarding per capita distributions, please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. Calculations of estimated per capita payments were not included as part of the scope of the socioeconomic studies prepared in connection with the Draft EIS and Final EIS (EIS Appendices A and L).

Response to Comment T6-14

Please see **General Response 3.3** regarding the purpose and need for the Proposed Action, **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS, **General Response 3.5.4** regarding alternatives, and **Response to Comment T6-09**. As required by NEPA, each of the alternatives included in the EIS was extensively evaluated to a similar level. The Final EIS, Volume II, Section 1.3 has been clarified to state that "the Proposed Action *would* assist the Tribe" in meeting its objectives, versus "the Proposed Action is *needed* to assist the Tribe" in meeting its objectives.

Response to Comment T6-15

Please see **General Response 3.5.2** regarding consideration of alternatives and information regarding tribal services and housing. The Final EIS, Volume II, Section 1.3 has been clarified to state that "the

Proposed Action *would* assist the Tribe" in meeting its objectives, versus "the Proposed Action is *needed* to assist the Tribe" in meeting its objectives. Please see **General Response 3.5.4** and Final EIS Section 2.10.8 for more information on the Lowery Site.

Response to Comment T6-16

Please see **Response to Comment T6-13,** and **General Response 3.5.3**, and Final EIS **Appendix L** regarding the issue of economic viability of the project alternatives.

Response to Comment T6-17

Please see **General Response 3.5.4** and Final EIS **Appendix L** regarding the Alternative F project components and layout and tribal services and housing.

Response to Comment T6-18

Please see **General Response 3.5.4** and Final EIS Section 2.10.8 for more information on the Lowery Site. The Final EIS has also been updated to address the acquisition of the Lowery Site in trust for the Tribe.

Response to Comment T6-19

Alternative A has been modified to remove the outdoor amphitheater component. Please see revised text in Final EIS Volume II Section 2.7.1.

Response to Comment T6-20

Refer to **General Response 3.11** impacts associated with the floodplain and flooding. Regarding how the stormwater pond and bank stabilization were identified in Draft EIS, Section 2.3.2, which provides the description of Alternative A, provides a reference to Figure A4 in the Grading and Drainage Analysis Report. Figure 2-8 of the EIS has been updated to show an increased setback from the Sacramento River. The updated figure also shows the location of the stormwater pond and bank stabilization in relation to the FEMA-designated 100-year floodplain. In addition, Sections 2.3.2, 4.3.1, and 4.3.3 of the EIS have been revised to clarify that the stormwater pond and bank stabilization would be developed in the 100-year floodplain.

The potential impacts of developing the proposed stormwater pond and bank stabilization have been fully addressed through the EIS. With regard to flooding, the proposed storm water detention pond has not been designed to mitigate storm water quantity of runoff, but rather is an infiltration wet pond used to attenuate rare-event potential flood flows resulting from Churn Creek overtopping I-5 and improve storm water quality. The pond will be entirely excavated from the upland portion of the floodplain and there is no proposal to place fill in the floodplain. Removing soil from the floodplain would not increase flooding risks. Likewise, the proposed streambank stabilization measures within the floodplain would involve balanced removal and replacement of material within the floodplain.

Response to Comment T6-21

As described in **General Response 3.11** and the updated text in Final EIS Section 2.3.2, the streambank stabilization measures have been revised from those described in the Draft EIS, and now emphasize live native vegetation and existing native materials, in lieu of the importation and placement of boulders described in the Draft EIS. The project would not disturb the existing vertical loam bank and would include establishing riparian trees in the setback area between the existing riverbank and the proposed hardscape features of the project. This would stabilize and reduce the meander potential within the mantle of loamy soil while preserving the existing cut bank and natural river processes. Figure 2-8.2 has been added to Final EIS Section 2.0 to depict the cross section of these measures and Figures 2-8.1, 2-10, 2-12, and 2-14 have been revised to show the 150-foot buffer from top of bank in relation to the proposed development and the extent of the area for vegetative streambank stabilization for Alternatives A, B, C, and D.

Response to Comment T6-22

Please see **General Response 3.9** regarding water supply. The water supply well that would be utilized under Option 1 for water supply have not been designed or developed on the Strawberry Fields Site at this time. The assessment of the groundwater quality and quantity is based on documented wells and groundwater conditions in the vicinity of the site.

Response to Comment T6-23

The proposed locations of the connections to off-site water and wastewater lines are described in the Alternatives Section of the EIS with references to **Figure 4.14-2** which depicts their location.

Response to Comment T6-24

Please see **General Response 3.5.4** regarding the appropriate range of alternatives to analyze related to issues of water supply and wastewater disposal.

Response to Comment T6-25

The proposed lift station was illustrated in Draft EIS Appendix B, Exhibit 3. Both the Events Center and proposed lift station are now illustrated on the updated Figure 2-8.1 in the Final EIS.

As noted in the comment, the height of the most visually dominant feature of Alternative A, the hotel tower, was noted in the Draft EIS. Regarding the heights of the other various Alternative A structures, please see the updated Final EIS Section 2.3.2, which now lists the heights of the various building components.

The offsite improvements required for access to the site, including the potential widening of the bridge on Bechelli Lane over the canal just north of the site, were described in the Draft EIS Section 2.3.2, and analyzed throughout the Section 4.0 of the Draft EIS. The potential environmental consequences of the off-site improvements were often specifically described under the subheading of "Offsite Improvements".

From the context of the comment in the fourth bullet point, it appears that the commenter is referring to Draft EIS Figure 2-16 (for the Anderson Site). Information regarding the detention basins and drainage are described in Draft EIS Section 4.3.5. In addition to that text, a figure of the features requested by the commenter is included at Draft EIS Appendix C, Figure E4. Final EIS Figure 2-16 has been updated to include the proposed detention basins. Because of the fine level of detail of the drainage features in Draft EIS Appendix C, Figure E4, these features have not been incorporated into Final EIS Figure 2-16. Please see Draft EIS Appendix C, Figure E4 for an illustration of these drainage features.

Response to Comment T6-26

As a practical matter, the process of forecasting the precise date of construction and completion of the project alternatives is inherently uncertain. The projects' scale, need for a federal action and public review all contribute to this uncertainty. Although it is true that the degree of uncertainty decreases as time passes and the regulatory process unfolds, it would be unreasonable to constantly update project related analyses and timelines. Preparation of revised analyses to evaluate effects caused by the passage of time, or other factors (e.g., changes in the competitive environment) would be a constantly changing process, and would delay the Proposed Project for no viable reason. Furthermore, preparation of subsequent analyses can merely perpetuate a continual cycle of document revisions, followed by new commenter assertions that fresher data, or a more recent baseline, is still required. Such repetitious exercises are not generally beneficial or required. As stated by the U.S. Court of Appeals for the District of Columbia Circuit:

> "However desirable it may be for agencies to use the most current and comprehensive data available when making decisions, the FAA has expressed its professional judgment that the later data would not alter its conclusions in the EIS or the approval of Alternative C, and it is reasonably concerned that an unyielding avalanche of information might overwhelm an agency's ability to reach a final decision. [Citation omitted] The method that the FAA chose, creating its models with the best information available when it began its analysis and then checking the assumptions of those models as new information became available, was a reasonable means of balancing those competing considerations, particularly given the many months required to conduct full modeling with new data."[6]

The Final EIS has been updated to reflect the new anticipated date for construction of 2024, with a operation potentially commencing in 2026. The following explanation has also been added as a footnote in Section 2.3.2:

> "It should be noted that the technical analyses related to traffic, noise and air quality modeling assumed that construction would commence during an earlier year, and would continue over a number of years, with full buildout being achieved in 2025. Assuming earlier construction and operational years for the air quality and GHG modeling yields a

[6] Source: Village of Bensenville v. FAA, 457 F.3d 52, 71-72 (D.C. Cir. 2006). Available at Legal.com and accessed October 2, 2019 at https://www.leagle.com/decision/2006509457f3d521504

conservative result, as emissions in future years tend to have lower emission factors due to improvements in emissions technology and more stringent regulatory standards. With respect to traffic and noise, baseline opening year traffic volumes were estimated based on pre-pandemic counts/traffic projections; thus this would offset the expected increase in traffic resulting from a later opening year condition."

Response to Comment T6-27

Please see **General Response 3.17** regarding the distinction between BMPs and mitigation measures, and whether enforcement of BMPs is warranted.

Response to Comment T6-28

Please see **General Response 3.5.4** regarding tribal services and housing elements of project alternatives.

Response to Comment T6-29

Please see **General Response 3.11** regarding compliance with Executive Order 11988 Floodplain Management.

Response to Comment T6-30

The BIA as Lead Agency, has consulted with various federal, State, and local agencies as appropriate throughout the NEPA process and included discussion of relevant consultation in various sections of the Draft EIS. The Final EIS Section 6.0 has been updated to reflect the comprehensive list of these consultations. Additionally, federal, State, and local agencies were provided the opportunity to comment on the Draft EIS during the public comment period. Please see below regarding the BIA's consultation with the agencies specifically noted by the commenter.

- U.S. Fish and Wildlife Service (USFWS) – Refer to **General Response 3.12.1**, **Response to Comment T6-31**, and Final EIS Section 6.3.
- National Marine Fisheries Services (NMFS) – Refer to **General Response 3.12.1**, **Response to Comment T6-31**, and Final EIS Section 6.3.
- Advisory Council on Historic Preservation (ACHP) – Please refer to Final EIS Section 4.6.1 regarding the status of consultation under Section 106 of the National Historic Preservation Act (NHPA).
- State Historic Preservation Office (SHPO) – Refer to **Response to Comment T4-02** and Final EIS Section 4.6.1, and Final EIS Section 6.4.
- California Department of Water Resources (DWR) – Refer to Final EIS Sections 3.3, 4.3 and 8.0 regarding various DWR reports and documents that were reviewed and referenced. The NOA for the Draft EIS was sent to DWR; however, no comment letter was received.
- Central Valley Flood Protection Board – Refer to **Responses to Comment Letter A1** and **Response to Comment T6-32**.
- Federal Emergency Management Agency (FEMA) – Refer to **General Response 3.11**.

- California State Lands Commission – Refer to **Responses to Comment Letter A10** and **Response to Comment T6-32**.
- California Department of Fish and Wildlife (CDFW) – As described in Draft EIS Section 3.5.2, a query of CDFW's California Natural Diversity Database (CNDDB) for special-status species known to occur on the Enterprise USGS 7.5 minute topographic quad was conducted to inform the analysis of the Draft EIS and was included in Draft EIS Appendix D-5. Comments provided by CDFW during the scoping period were considered during preparation of the EIS. Additionally, refer to **Responses to Comment Letter A9**.

Response to Comment T6-31

Refer to **General Response 3.12.1**. A Biological Assessment was sent to the USFWS in July 2018 (Draft EIS Appendix D-1). On February 20, 2020, the USFWS concurred with the Biological Assessment that the project may affect but is not likely to adversely affect federally listed species, and no further consultation is needed. The Proposed Project was evaluated for potential impacts to listed fish species and Critical Habitat in consultation with the National Marine Fisheries Service (NMFS; Draft EIS Appendix D-2). NMFS reviewed the project under ESA Section 7(a)(2) and MSMA in a concurrence letter (May 7, 2019) and determined the proposed actions were not likely to affect listed fish species with the inclusion of mitigation measures listed in Draft EIS Appendix D-2 (see **General Response 3.12.2**). All consultation correspondence is included in Final EIS Appendix O. Therefore, impacts to special-status species would be mitigated to a less-than-significant level.

Please see **Response to Comment A9-05** regarding revisions to the streambank stabilization measures to reduce potential impacts. Please also see **General Response 3.12.1** and **3.12.2** regarding potential effects to special-status species and habitat, including bank swallows and certain fish species.

Response to Comment T6-32

The relationships of the proposed developments are shown in relation to the Sacramento River in EIS Figures 2-8, 2-10, 2-12, 2-14, and numerous other exhibits in the EIS. Development of Alternatives A through D would comply with all applicable federal regulations.

As identified in Draft EIS Section 3.3.2, the Central Valley Flood Protection Board has jurisdiction over the Sacramento River within the designated floodway which follows the boundary line of the FEMA 100-year floodplain or is located west of the FEMA 100-year floodplain boundary line adjacent to the Strawberry Fields Site as shown in Figure 3.3-1. Please refer to the **Response A1-01** regarding permitting with the Central Valley Flood Protection Board.

As identified in Draft EIS Section 3.3.2, the California State Lands Commission has jurisdiction over submerged lands and the beds of navigable lakes and waterways. Along the Sacramento River, this jurisdiction extends to the ordinary high-water mark. Please refer to the **Response A1-02**. As described therein, all work, including the planting of willows and other native trees for streambank stabilization (see **General Response 3.11**), would occur above the ordinary high-water mark of the Sacramento River and therefore outside of the State Lands Commission's jurisdiction.

The California Department of Fish and Wildlife has jurisdiction through the State's Fish and Game Code Section 1602 of the bed, channel and bank of any river, stream or lake within the State. All development would occur once the Strawberry Fields Site has been taken into trust and would therefore be outside of the jurisdiction of CDFW.

Response to Comment T6-33

Please see **General Response 3.11** regarding issues related to flooding and floodplains.

The proposed development as described in the report avoids filling within the Regulatory Floodway of the Sacramento River or the FEMA 100-year floodplain. None of the work including the Streambank Stabilization component would alter the drainage course or the base flood elevation of the AE 100-year floodplain. Section 6.2.1 of the Grading & Drainage Study recommends bio-technical stabilization methods to stabilize the east bank of the Sacramento River adjacent to the project. Bio-technical stabilization includes re-establishing native vegetation within the 150-foot building setback to mechanically stabilize the bank and reduce erosion caused by high Sacramento River flows. As detailed in Section 6.2.1 of the Grading & Drainage Study (Final EIS Appendix N), bio-technical stabilization does not include fill within the Regulatory Floodway or the FEMA 100-year floodplain, nor does it result in a change to the channel characteristics of the Sacramento River that would require a Letter of Map Revision to be processed through FEMA. Therefore, even if the site were subject to the National Flood Insurance Act, the project alternatives would not require a Floodplain Development Permit.
The stormwater pipes were designed to convey a 10-year event without surcharge. The 100-year storm was used for detention in accordance with the City of Redding Construction Standards, which were determined applicable due to the project being surrounded by the City of Redding. These standards were applied to Win River which is similar to the proposed development. All surface improvements are outside of the 100-year floodplain; however, stormwater disposal is within the 100-year floodplain.

Response to Comment T6-34

As described in Section 3.3.2 of the Draft EIS, the project site is located within the Sacramento-Lower Cow-Lower Clear Watershed within the Sacramento River Basin. The Sacramento River is approximately 327 miles long and drains approximately 27,000 square miles. A figure showing this area is not needed to evaluate the impacts to this basin. Within this general setting, the assessment of the on-site water supply option is focused on the specific factors of the project area. Please see **General Response 3.9** regarding water supply. Mitigation measures such as 5.5.3 Wetlands and Waters of the U.S. and 5.2 (A) Geology and Soils would reduce potential impacts from water supply and wastewater disposal to less-than-significant levels.

Disposal of treated effluent would not adversely impact water quality or aquatic habitat within the Sacramento River. Disposal would occur through landscape irrigation and percolation in leach fields and would not be discharged into the river. Effluent would be treated to meet disinfected tertiary recycled water standards under Title 22 of the California Code of Regulations. Effluent would be of high quality and would not have the potential to significantly degrade surface water or groundwater quality. Section

4.3, 4.10 of the EIS addresses the potential environmental effects of water supply and wastewater treatment and disposal.

Regarding the seasonal wetlands and ponds, water supply would be sourced through either a municipal connection or through use of a groundwater well. The seasonal wetlands are small (combined less than half of one tenth of an acre) and do not rely on groundwater and therefore would not be impacted by water use. Similarly, the individual ponds are small features and likely do not rely on groundwater and rather express water through collection of surface runoff. As discussed in Section 4.3 of the Draft EIS, significant impacts to groundwater levels would not occur. Under all alternatives and wastewater treatment options, the ponds and seasonal wetlands are set back from the leach field, with the nearest feature being the southerly pond located nearly 400 feet from the leach field. Even with seasonal variations in the size of the seasonal wetlands and ponds, these features would be well outside of the leach fields and would not be impacted by the wastewater treatment system.

Please see **Response to Comment T6-31** and **General Response 3.12** regarding impacts to listed fish species and Critical Habitat. As described therein, NMFS reviewed the project under ESA Section 7(a)(2) and MSMA in a concurrence letter (May 7, 2019) and determined the proposed actions were not likely to affect listed fish species with the inclusion of mitigation measures listed in Draft EIS Appendix D-2 (see **General Response 3.12.2**). Therefore, impacts to Special-status species would be mitigated to a less-than-significant levels.

Response to Comment T6-35

Please see **Response to Comment T6-34** regarding the potential impacts to seasonal wetlands and ponds from the proposed on-site water supply or wastewater disposal options. Pursuant to consultation with the USFWS, CRLF has been removed as a federally-listed or projected species that may occur on the project sites, due to the project's location outside of the current range of the species (Final EIS Appendix O-3). These changes have been incorporated into Final EIS, Volume II, Section 4.5. Therefore, no impacts to listed amphibians would occur from operation of onsite water and wastewater systems.

Response to Comment T6-36

Please see **General Response 3.9** regarding water supply.

Response to Comment T6-37

Please see **Response to Comments T6-34** through **T6-36** regarding ground water. Also see **General Response 3.5.4** regarding the appropriate range of alternatives to analyze related to issues of water supply and wastewater disposal.

Response to Comment T6-38

Please see **General Response 3.11** regarding issues related to flooding and floodplains. The statement(s) regarding a balance cut and fill on the site are regarding assessment of the possibility of temporary construction traffic due to the potential of hauling excess material off site. All earth disturbed on-site

would be placed as engineered fill on-site outside of the regulatory floodplain and would thus not generate any traffic on nearby public roads.

Response to Comment T6-39

Please see **General Response 3.9** regarding Sacramento River streambank stabilization and vegetative buffer and **General Response 3.11** regarding issues related to flooding and floodplains. As described in Final EIS Appendix N and Final EIS Section 2.3.2, Alternative A has been revised to provide a 150-foot setback from the top of the bank of the Sacramento River. The Proposed Project would not disturb the existing vertical loam bank and would include establishing riparian trees in the setback area between the existing riverbank and the hardscape features of the Proposed Project. This would stabilize and reduce the meander potential within the mantle of loamy soil while preserving the existing cut bank and natural river processes as described in Bank Swallow Conservation Strategy for the Sacramento River Watershed, California Bank Swallow Technical Advisory Committee, June 2013.

Please see **Response to Comment T6-31** and **General Response 3.12** regarding impacts to listed fish species and Critical Habitat. As described therein, NMFS reviewed the project under ESA Section 7(a)(2) and MSMA in a concurrence letter (May 7, 2019) and determined the proposed actions were not likely to affect listed fish species with the inclusion of mitigation measures listed in Draft EIS Appendix D-2 (see **General Response 3.12.2**). Therefore, impacts to Special-status species would be mitigated to a less-than-significant levels.

Response to Comment T6-40

A planning-level hydrology study for Alternative E (Anderson Site Alternative) has been prepared as a part of the EIS and is included as Draft EIS Appendix C. With this planning-level study, the design proposes equal volumes of fill material to be placed within and cut material to be removed from the FEMA 100-year floodplain, maintaining the same (or greater) total volume of flood storage on the site. This level of detail is typically required at this early planning stage of the project to determine if the project is feasible, and a more in-depth hydrology report would be prepared during the detailed design of Alternative E prior to construction. A CLOMR would be processed through FEMA prior to construction and a LOMR would be processed through FEMA after project construction. Draft EIS Section 4.3.5 presents an analysis on potential impacts related to flooding that could occur as a result of Alternative E. As discussed therein, because 36 af of the approximately 58 af of existing storage within the 100-year floodplain on the Anderson Site would be filled as a result of the grading activities, a "Letter of Map Revision – Fill" would have to be issued by FEMA (Draft EIS Appendix C); the preparation and submission of a letter request is included as Mitigation Measure A in Draft EIS Section 5.3. This storage would be relocated to the southern portion of the Anderson Site in the form of detention ponds, as described below. Therefore, the impacts of Alternative E to the floodplain would be less than significant, and, provided that the "Letter of Map Revision – Fill" is filed with FEMA, Alternative E would be in compliance with EO 11988.

The drainage system for the Anderson Site would be designed incorporating a combination of infiltration trenches, infiltration/detention basins and numerous other storm water quality and quantity BMPs to

encourage groundwater infiltration in order to mitigate storm water runoff levels due to the increase of impervious areas. Regarding consultation with FEMA, the Draft EIS Section 5.5.3, identifies mitigation whereby the Tribe shall consult with FEMA regarding the need for FEMA review of potential floodplain impacts. If applicable, the Tribe shall adhere to all conditions of the permits to ensure the protection of the floodplain and water quality during construction activities.

Response to Comment T6-41

The commenter quotes 42 U.S.C. § 4101 (e) "…the Administrator shall assess the ***need*** [emphasis added] to revise and update all floodplain areas … based on an analysis of all natural hazards affecting flood risks." The commenter then goes on to state that the FIRM was last updated in 2011 and therefore FEMA must re-calculate the BFE and reassess the flood zones for the Strawberry Fields Site. In response, 42 U.S.C. as quoted by the commenter does not require that FEMA must re-calculate the BFE and flood zones every 5 years. It clearly states that the Administrator shall assess the need to do so based on the natural hazards affecting flood risk.

The commenter has not presented any evidence that the Administrator has not assessed the need to revise and update the floodplain areas. Nor have they shown any evidence that any of the natural hazards affecting flood risks at the subject site has changed in any quantifiable way since 2011.

The Strawberry Fields Site is located immediately adjacent to the Sacramento River, approximately ten river-miles below the Shasta Dam/Keswick Dam couplet and two river-miles upstream of Clear Creek, which is the nearest tributary capable of increasing the flow rate of the river to a measurable degree. The flow in this stretch of river is tightly regulated by releases through Shasta and Keswick Dams. Per the Flood Insurance Study for Shasta County, the 10-year, 50 year, and 100-year recurrence interval peak flows in the Sacramento River all coincide at 79,000 cfs. This is based on the maximum release allowed by regulation from Shasta and Keswick Dams.

This level has been approached or exceeded 5 times since Shasta Dam began impounding water in 1944. Per the USGS streamflow gauge on the Sacramento River at Keswick, peak flows were:

- 78,900 cfs January 24, 1970
- 81,400 cfs April 1, 1974
- 76,900 cfs February 19, 1986
- 79,200 cfs January 4, 1997
- 83,000 cfs February 14, 2017

It is evident that the base flood occurs on average about once every 12 years and has not been significantly exceeded in 74 years. This is consistent with the 10-year, 50-year and 100-year designation for 79,000 cfs in the flood insurance study. The flood elevation and extent are also well known and documented in this area due to the 5 full-scale modeling events that have occurred since 1944. The on-site flooding condition of February 2017 was closely observed and documented to be contained within the riverbank on the northern portion of the Strawberry Fields Site, west of the proposed development. The

Flood Insurance Rate Map is the best available mapping, and there is no doubt that the proposed improvements are outside of the regulatory 100-year floodplain also known as Zone AE.

Response to Comment T6-42

As described in Section 4.3 of the Draft EIS, the on-site infiltration wet pond is sized to accommodate twice the runoff volume of the 85th percentile storm and would allow for infiltration of stormwater into the native soil. Stormwater runoff from the development area would be infiltrated on the site and would not discharge to the Sacramento River; therefore, there would be no impacts to water quality and aquatic habitats of the Sacramento River. There would be no loss of riparian vegetation along the Sacramento River due to the 150-foot setback incorporated into the Alternative A. The proposed planting of willows along the river to stabilize the bank would increase riparian vegetation, improving the quality of aquatic habitat.

Response to Comment T6-43

Please see **Response to Comment A6-12** regarding State attainment status.

A discussion of Shasta County AQMD air quality thresholds has been added to Sections 3.4 and 4.4 of the Final EIS. Shasta County AQMD thresholds would only pertain to the construction of off-site improvement areas within the City and County boundaries and would be subject to City and County approvals.

Draft EIS Section 4.4.2 discloses that "emissions from construction equipment have the potential to increase the concentration of DPM in the close vicinity (within approximately 500 feet) of the construction site, if control measures are not implemented…To reduce project-related construction fugitive dust and DPM emissions, Best Management Practices (BMPs) are provided in Section 2.3.2. BMPs provided in Section 2.3.2 would reduce DPM emissions from construction equipment by approximately 70 percent, avoiding potentially adverse effects to nearby sensitive receptors." Therefore, the Draft EIS does analyze the potential for impacts from DPM emissions. BMPs provided in Section 2.3.2 to reduce DPM include but are not limited to using newer, more efficient tier engines, reducing on-site idling, equipping engines with diesel particulate filters, and staging construction equipment far from sensitive receptors as possible. These methods are consistent with California Air Resource Basin (CARB) strategies to reduce DPM from construction activities. Further, DPM emissions are of greater concern in high-density regions with elevated ambient pollutant concentrations. Therefore, construction BMPs, coupled with the rural nature of the project, would ensure that sensitive receptors are insulated from DPM impacts.

Version 2016.3.1 of CalEEMod rather than Versions 2016.3.2 was used to estimate the construction and operational emissions of the project alternatives. According to the South Coast Air Quality Management District (SCAQMD) website, updates in Version 2016.3.2 of CalEEMod fixed minor software bugs, improved user experience, added 2016 Title 24 building efficiency reductions, and fixed miscalculations that overestimated the annual fugitive dust emissions for PM_{10} and $PM_{2.5}$. Therefore, project alternative emission estimates are conservatively overestimated, and no revisions are needed.

In regards to whether the 30 percent reduction in the trip generation rate for the event and conference centers that was incorporated in the CalEEMod air quality model is consistent with the traffic analysis, the traffic analysis is based on peak daily trips and, therefore, assumed that events would be occurring at the event and conference center when calculating peak daily trips generated by the project alternatives; while the air quality analysis is based on annual emissions and, therefore, includes the annual emissions from operation of the event and conference center. As described in Draft EIS Section 4.4.1, these facilities would be used approximately 256 days annually; therefore, assuming trips associated with the event and conference center would occur all year round (365 days) would be overly conservative. The 30 percent reduction is based on 365 days/256 days multiplied by 100 equals 30 percent. The assumptions used in the air quality and traffic analysis are appropriate to analyze impacts in their respective issue areas.

The Tribal Minor New Source Review Permit (Tribal NSR Permit) is designed to ensure that air quality is not significantly degraded from the addition of new and modified sources such as factories, generators, industrial boilers, and power plants. Threshold limits for select regulated emissions in the Tribal NSR Permit are based on the attainment status of the County in which the stationary source would be located. Shasta County is attainment or unclassified for all criteria emissions. Because Shasta County is in attainment for reactive organic gases (ROG), the emission threshold is five tons per year (tpy) rather than two tpy if it were in nonattainment. Final EIS Section 4.4 Air has been updated to reflect the five tpy ROG threshold limit. No Tribal Minor NSR permit is expected to be needed for any of the project alternatives.

Response to Comment T6-44

Regarding the inclusion of parking areas in the analysis of construction impacts, the commenter is incorrect. As shown in the CalEEMod inputs and outputs provided in Draft EIS Appendix I, and as specifically noted in Section 4.4.1 of the Draft EIS, emissions estimates from construction of the Proposed Project include parking areas. The CalEEMod default equipment inventory was deemed appropriate based on similar projects. No changes to the equipment inventory are warranted.

Response to Comment T6-45

The USFWS species, California Native Plant Society (CNPS) rare plant, and California Natural Diversity Database (CNDDB) lists have been updated in the Final EIS. No additional species have been added to these lists. The CNDDB query utilized a single quad search, where data is returned within the bounds of a single U.S. Geological Service 7.5' quadrangle (quad). A single quad ranges in size from 49 to 71 square miles[7]. A nine quad search is not required by CEQA or NEPA and often lists species with habitat and range far outside of the focused project area due to the large size of the quads. Consultation for species listed with NMFS and USFWS was completed in 2019 and 2020, respectively, based upon updates species lists. USFWS and NMFS concurrence, as well as updated species lists, are provided in Final EIS Appendix O.

[7] Pennsylvania State University, n.d.. Legacy Data: USGS Topographic Maps. Available online at: https://www.e-education.psu.edu/natureofgeoinfo/book/export/html/1808. Accessed May 2023.

Response to Comment T6-46

As described in Draft EIS Section 3.5.2, a wetland delineation was verified by the USACE in March 2017 and was included in Draft EIS Appendix D-4. Refer to **Response to comment T6-32** regarding agency jurisdiction associated with the proposed streambank improvements.

Response to Comment T6-47

Impact acreages by habitat type for Alternatives A through D have been generated in Geographic Information System (GIS) software by overlaying the site plans presented in Figures 2-8.1, 2-10, 2-12, and 2-14 of Volume II of this Final EIS with the habitat map presented in Figure 3.5-1 of the Draft EIS. Impacts would be limited to annual grasslands, with the exception of the stormwater swale and infiltration wet pond and the wastewater Option 2 leach field considered under Alternatives A through C. Wastewater Option 2 of Alternatives A through C encompass 1.0 acres of riparian vegetation. Additionally, a small area of Valley oak woodland (less than 0.1 acre) overlaps with this area and the stormwater infrastructure under Alternatives A and C. While this would not result in a loss of oak woodland, minimal individual oaks could be impacted. Section 4.5 of the EIS has been revised to specify this area. Alternative D fully avoids both oak woodland and riparian habitats. Although the riparian and Valley oak woodland habitat may support special-status species, these habitats are not identified as sensitive or limited in distribution under federal designations and are not provided formal protections at the federal level.

Refer to **General Response 3.9** and **3.11** and Final EIS Section 2.3.2 regarding the streambank stabilization approach. As described therein, the streambank stabilization measures proposed in the Draft EIS have been modified to include a 150-foot setback from the top of bank, an emphasis on live native vegetation, and use of existing native materials in place of riprap/boulders.

Response to Comment T6-48

Refer to **General Response 3.9** and **3.11** and Final EIS Section 2.3.2 regarding the streambank stabilization approach. As described therein, the streambank stabilization measures proposed in the Draft EIS have been modified to include a 150-foot setback from the top of bank, an emphasis on live native vegetation, and use of existing native materials in place of riprap/boulders. Therefore, comments regarding the windrow rock slope protection method are no longer relevant.

As described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives; therefore, no significant noise impacts would occur in connection with the amphitheater.

Please see **Response to Comment T6-31** and **General Response 3.12** regarding impacts to listed fish species and Critical Habitat. Sections 3.12 and 4.12 of the EIS list and evaluate the potential for hazardous materials to occur onsite.

Response to Comment T6-49

Please see **General Response 3.12.1** and **3.12.2** regarding potential effects to special-status species and habitat, including bank swallows.

Response to Comment T6-50

As discussed in Draft EIS Section 3.5, "Biological resource surveys and focused botanical surveys of the Strawberry Fields Site were conducted on April 25, 2007, May 3, 2007, May 9, 2007, June 27, 2007, May 16, 2016, and March 13, 2017." Additional VELB surveys for elderberry shrub were conducted on May 21, 2019. On February 20, 2020, the USFWS concurred with the Biological Assessment that the project may affect but is not likely to adversely affect federally listed species, and no further consultation is needed.

Response to Comment T6-51

Pursuant to consultation with the USFWS, CRLF has been removed as a federally-listed or projected species that may occur on the project sites, due to the project's location outside of the current range of the species (Final EIS Appendix O-3). These changes have been incorporated into Final EIS, Volume II, Section 4.5.

Pre-construction surveys for listed species would be implemented pursuant to federal agency regulations. Please see **General Response 3.12** regarding the potential impacts to listed species. Mitigation measures such as **5.5.3** Wetlands and Waters of the U.S. and **5.2 (A)** Geology and Soils would reduce potential impacts from onsite water supply and wastewater options to less-than-significant levels.

Response to Comment T6-52

A VELB-focused survey was conducted on May 21, 2019 in accordance with *Conservation Guidelines for the Valley Elderberry Longhorn Beetle* (USFWS, 1999), and results have been incorporated into the Final EIS. The 2019 survey identified an additional three elderberry shrubs along the Sacramento River and within close proximity (<20 ft.) to the location of the singular elderberry shrub identified in the 2016–2017 surveys. Diameters of stems at ground level were 1–3 in. with the exception of four being >3 in. but <5 in. No indicators or boreholes for VELB were observed in these three elderberry shrubs. See Updated Biological Assessment for the USFWS (Final EIS **Appendix O**-3). On February 20, 2020, the USFWS concurred with the Biological Assessment that the project may affect but is not likely to adversely affect federally listed species, and no further consultation is needed.

Response to Comment T6-53

Refer to **Response to Comment T6-51**.

Response to Comment T6-54

Mitigation Measure 5.5.3.Q.3 has been updated to clarify that standard precautions include measures identified in Mitigation Measures 5.2.A (Best Management Practices to be included in the Stormwater Pollution Prevention Plan).

Response to Comment T6-55

Please refer to **Response to Comment T4-02** regarding consultation with SHPO.

Response to Comment T6-56

The area of potential effect (APE) is specifically defined in Draft EIS Section 3.6.3 for Strawberry Fields, the northern access area, the southern access area, and the Anderson site. These areas are clearly illustrated in Draft EIS **Figures 2-8** and **2-16**. Those figures have been updated in the Final EIS, with additional detail regarding the elements that comprise the Proposed Project. The APE for the off-site traffic mitigation improvements and utility/infrastructure connections are described in Draft EIS Sections 4.14.1 and 4.14.2, respectively.

Please see **Response to Comment T4-02** regarding SHPO consultation.

Response to Comment T6-57

Comment acknowledged. Mitigation Measure 5.6 C has been added to the Final EIS requiring construction worker awareness training and construction monitoring by a team of archaeologists and Native Americans.

Response to Comment T6-58

Mitigation measures have been added in Final EIS Section 5.6 requiring preparation of an Unanticipated Discoveries Plan prior to ground-disturbing activities and the language in the mitigation measures has been strengthened.

Response to Comment T6-59

A Memorandum of Agreement is not warranted unless adverse effects to resources are expected (36 CFR Section 800.6). As discussed in Final EIS Section 4.6, no significant impacts are anticipated to occur with the implementation of recommended mitigation and, in a letter dated May 9, 2023, the SHPO concurred with the BIA's finding (refer to Final EIS Appendix P); therefore, a Memorandum of Agreement is not warranted for the Proposed Action.

Response to Comment T6-60

Discussion in Final EIS Volume II, Sections 3.6 and 3.6.3 were expanded to include additional discussion and conclusions of the Anderson cultural study and related citations.

Response to Comment T6-61

The Extended Phase I and Phase II Testing reports were submitted to the NEIC in March 2017. The Anderson Site, Off-Site Improvements reports, and updated Extended Phase I and Phase II Testing reports were submitted in April 2023.

Response to Comment T6-62

Background context information referred to by the commenter is solely located in the cultural reports which form Draft EIS Appendix E. The background reports and the results as reported in the Draft EIS emphasize the presence of buried cultural resources and acknowledge the potential environmental effects of the action. It is understood that multiple tribes may have used the Strawberry Fields Site.

Response to Comment T6-63

Comment noted. Please refer to **Response to Comment T4-01** regarding site CA-SHA-266. Site surveys and testing programs have thus far failed to identify any cultural resources that would be affected by the South Access Road or Wastewater leach field improvements. The monitoring program included in Mitigation Measure 5.6 C. would ensure that if these project components are constructed and if they encounter archaeological resources, then the finds would be treated in accordance with the Unanticipated Discoveries Plan developed as part of Mitigation Measure 5.6 A.

Response to Comment T6-64

Because the Draft EIS proceeded through various drafts circulated prior to its publication, it is possible that the census data included in Draft EIS Section 3.7 was not the latest available at the time of its publication. Please see **Response to Comment T6-26** regarding why it is not appropriate or desirable to continually update EIS analyses so that they include the most recent data. Nevertheless, Final EIS, Volume II, Section 3.7 has been revised to include the updated census data. Specifically, Tables 3.7-1 through 3.7-5 and 3.7-8 have been updated to reflect more recent data. The text in Final EIS Section 3.7 has also been updated as necessary, to reflect the more recent data. Please see Final EIS Section 3.7.

Response to Comment T6-65

The commenter states that the Draft EIS "incorrectly concludes that there are no low-income populations in the study area." The analyses included in Draft EIS Section 3.7 are based on the census data that was then available. Final EIS Section 3.7 has been updated with revised census data. As depicted therein, some of the census tracts in the vicinity of the project sites have changed subsequent to the publication of the Draft EIS, such that the percentage of minority households in some of the tracts has increased substantially. The poverty threshold for a family of three has also increased, from $20,090 to $24,860. In addition, both the CEQ and USEPA have updated their environmental justice screening tools. In April of 2023 the White House issued Executive Order 14096, which expands the definition of potentially disadvantaged communities. Final EIS Section 3.7 has been updated to incorporate recent census data, changes in the poverty threshold, and revised definitions per EO 14096. Final EIS Section 3.7 also uses the more recent CEQ and USEPA environmental justice screening tools, and includes details regarding how the minority population and household income data were analyzed.

In the process of updating the census tables in Final EIS Section 3.7, data from U.S. Census Bureau Table DP03 was used as the source. This Census Bureau table was one of the information sources suggested by the commenter. It should also be noted that the analyses in Final EIS Section 3.7 were supplemented by

census data from the block level, which are more granular and detailed than information aggregated at the census tract level.

As a result of these updates, Final EIS Section 3.7 now identifies a number of low-income and minority communities in the vicinity of the project sites. Potential disproportionate and adverse effects to these communities are analyzed in Final EIS Section 4.7.

The commenter's statement about substitution or competitive effects to local sporting goods stores under Alternative A is acknowledged. However, the commenter does not explain why this could be a disproportionate and adverse effect to low-income and minority communities.

Response to Comment T6-66

Senate Bill (SB) 743 (Steinberg, 2013) required the Governor's Office of Planning and Research to amend the California Environmental Quality Act (CEQA) Guidelines to provide an alternative to Level of Service (LOS) for evaluating transportation impacts. In December 2018 the California Natural Resources Agency certified and adopted the CEQA Guidelines update package, including the Guidelines section implementing SB 743. Beginning on July 1, 2020, the provisions of SB 743 are required to be adopted by lead agencies statewide.

This federal environmental review is not subject to California SB 743. At the time of scoping and initial preparation of the (Transportation Impact Study (TIS) for the Draft EIS during 2016, the proposed revisions to the CEQA Guidelines implementing SB 743 were in preliminary form with a substantial degree of speculation and uncertainty surrounding its implementation.

Although a Vehicle Miles Traveled (VMT) analysis is not warranted based on the timing of the project development efforts, qualitatively it is reasonable to expect that the Proposed Project site (adjacent to Insterstate-5) would likely reduce VMT when compared to the characteristics of the existing Win-River Casino site along SR-273. As reflected in Figure 29 of the TIS, over half of the existing site's trips were documented to originate from or be destined for the I-5 interchange at South Bonnyview Road. These "existing" trips would have significantly shorter trips to reach the Proposed Project site when compared to the existing Win-River Casino site.

The resulting environmental consequences of VMT as they related to air pollution (Draft EIS Section 4.4), climate change (Draft EIS Section 4.14) and vehicular noise (Draft EIS Section 4.11) have been analyzed in the respective sections of the Draft EIS.

Response to Comment T6-67

Comment noted. Please see **Response to Comment T6-101.**

Response to Comment T6-68

Please see **Response to Comment T6-101.**

Response to Comment T6-69

Please see **Response to Comment T6-101.**

Response to Comment T6-70

Please see **Response to Comment T6-101.**

Response to Comment T6-71

Please see **Response to Comment T6-101**. Also see **General Response 3.1.3** regarding the concept of a supplemental EIS.

Response to Comment T6-72

Final EIS Section 3.9.1 has been revised to state that issues of compliance with local ordinances are addressed in sections other than EIS Section 3.9. Specifically, information regarding compliance with local noise and scenic resources ordinances are addressed in Draft EIS Sections 3.11 and 3.13, respectively.

Response to Comment T6-73

County Objectives AG-3 through AG-6 were not included in Draft EIS Table 3.9-1 because these objectives do not apply specifically to zoning classification A-cg. However, they have been added to revised Table 3.9-1 in the Final EIS to reflect potential applicability to all zoning classifications..

Response to Comment T6-74

Final EIS Section 3.9 has been revised to clarify that these particular C-M zoned parcels are located east of I-5.

Response to Comment T6-75

Please refer to **General Response 3.8.2** regarding the use of agricultural land and **General Response 3.11** pertaining to facilities and the floodplain. The City includes the Strawberry Fields Site location in the City's General Plan. However, the parcel is currently under the jurisdiction of Shasta County. Please see **Response to Comment A4-03** for more information. The fact that the Strawberry Fields Site is located outside of City limits has limited bearing on its development potential. Because of its location, development of the Strawberry Fields site is compatible with surrounding land uses along the I-5 corridor.

Response to Comment T6-76

Although Alternative E is not consistent with allowable uses under existing zoning of the City of Anderson General Plan, it is compatible with surrounding land uses along the I-5 corridor. Land uses in the vicinity include residential subdivisions and commercial developments. Although Alternative E would differ from the surrounding rural and agricultural land uses, it would not disrupt neighboring land

uses, prohibit access to neighboring parcels, or otherwise conflict with neighboring land uses. Thus, while the proposed uses on the Anderson Site are not consistent with allowable uses under existing zoning, this inconsistency with existing zoning would not result in significant adverse land use effects.

Response to Comment T6-77

Please see **Response to Comment T6-26** regarding why it is not appropriate or desirable to continually update EIS analyses so that they include the most recent data. Nevertheless, Final EIS, Volume 2, Section 3.9.3 has been revised to reflect the 2017 Census of Agriculture Crop Report data.

Response to Comment T6-78

Project consistency with local zoning ordinances, land uses, land use ordinances is addressed in **General Response 3.8.1** and Response to Comments T6-76 and T6-77. Final EIS Section 4.9 has been updated to include additional information regarding consistency with local land use policies. This Final EIS Section 4.9 information is in text format, not a table.

Response to Comment T6-79

Although the Draft EIS uses reference to the hotel, motel, gas station, and fast food chains, it is also noted that "These land uses would represent a significant change from the current undeveloped conditions on the site, and would differ from adjacent land uses" (page 4.9-1). Please also refer to **General Response 3.8.1** pertaining to consistency with local zoning codes and **General Response 3.8.2** regarding the use of agricultural land.

Response to Comment T6-80

The commenter is correct that the reference in Draft EIS Section 4.15 should refer to the County's land use code, not the City's. Final EIS Section 4.15 has been updated to correct this. The commenter is not correct that Draft EIS Section 4.15 does not evaluate cumulative land use impacts. The text error notwithstanding, Draft EIS Section 4.15 does evaluate impacts, and concludes that there would be no cumulative impacts to land use.

Response to Comment T6-81

Please see **Response to Comment T6-26**. As described in Final EIS Appendix M, Section 4.3.1, in a letter to the Bureau of Indian Affairs on May 22, 2019 the City has stated that the City of Redding's water supply has the ability to provide water to the Strawberry Fields Site. Although this option is feasible, the connection to City water in any case is dependent on the discretion of the City of Redding City Council. In 2015, which was the second year in which the state was under an emergency drought declaration by the Governor, the average daily demand was approximately 18.9 MGD, with the peak demand being 41.6 MGD. The Foothills water treatment plant has the capacity to provide 44 MGD to the City. With the peak demand for these Alternatives being approximately 0.55 MGD, the City appears to have sufficient capacity in drought years, as well as non-drought years.

Response to Comment T6-82

As described in the City of Redding 2012 Wastewater Utility Master Plan, Sunnyhill Lift Station has an approximate peak wet weather flow of 17.21 MGD. As illustrated in Table 5.4 of the 2012 plan, the projected flows into the Sunnyhill Lift Station in 2020 and 2030 were estimated at 10.76 MGD and 10.78 MGD, respectively. The City of Redding updated its Wastewater Utility Master Plan in 2022. According to the 2022 Master Plan, the Sunnyhill Lift Station has an approximate firm capacity of 13.0 MGD.[8] Firm capacity is defined as "the lift station capacity with the largest pump out of service"; therefore, this capacity is conservative compared to the peak wet weather flow provided in the 2012 Plan. Projected flows into the Sunnyhill Lift Station in 2022 and 2032 have been revised to an estimated 12.44 MGD and 12.57 MGD, respectively. The 2022 Master Plan identifies four lift stations that are at or close to capacity and recommends upgrades and other improvements to these lift stations (Westside Lift Station, Mary Street Lift Station, North Market Street Lift Station and Hartnell Lift Stations). Sunnyhill Lift Station is not on this list. The peak flow from the Proposed Project is projected to be 0.501 MGD. The 2022 Master Plan does not state if the Proposed Project is included in the projected flow estimates described above. Under the conservative assumption that the Proposed Project is not included, the Sunnyhill Lift Station would be approximately at firm capacity once the project becomes operational. Thus, the Sunnyhill Lift Station has sufficient existing capacity to accommodate flows from the proposed development according to the City of Redding 2022 Wastewater Utility Wastewater Master Plan.

The Clear Creek Wastewater Treatment Plant currently has a design capacity of 8.8 MGD average dry weather flow and 16.2 MGD of peak hour wet weather flow. [9]. The 2022 Master Plan states that capital improvements were recently completed which expanded the capacity of Clear Creek Wastewater Treatment Plant peak wet weather flow to approximately 40 MGD. The maximum wet weather flow shown in the Master Plan is about 35 MGD [10]. With a peak flow of 0.501 MGD, the existing WWTP is confirmed to have sufficient current capacity to treat the peak flow generated by the Proposed Project.

Response to Comment T6-83

Please see **General Response 3.6.3** and **Response to Comment A6-03** regarding impacts to law enforcement, fire and EMS. Please also see **General Response 3.6.4** regarding fiscal impacts to local governments.

Response to Comment T6-84

Please see **Response to Comment A6-03** regarding impacts to law enforcement, fire and EMS. Please also see **General Response 3.6.4** regarding fiscal impacts to local governments. Law enforcement calls for service at the existing Win-River Casino are described in the Draft EIS Economic Impact Study (Draft EIS Appendix A), beginning with Figure 50. As described therein, impacts are calculated on a net basis, or the difference between calls for service from the project alternatives, less calls for service from the

[8] Table 6.4.2 of the City of Redding Wastewater Utility Master Plan – July 2022. Prepared by City of Redding Public Works Department. Available online at: https://www.cityofredding.org/home/showpublisheddocument/28362/638030694865370000

[9] Section 6.1.3 of the City of Redding Wastewater Utility Master Plan – July 2022.

[10] Final EIS Appendix M.

existing facility. Please see Draft EIS Appendix A for a detailed discussion of the methodology and analyses.

Neither Draft EIS Appendix A nor the fiscal effects analysis in Final EIS Appendix L analyzed impacts from the two fire/EMS options (Option 1 and Option 2) because: i). The fiscal impacts are smaller than those for law enforcement, and thus are not material to the calculation included in Final EIS Appendix L, Table 1, which would be positive under any reasonable set of assumptions and, ii). the fiscal impacts associated with fire and EMS services are not applicable under fire/EMS Option 2, whereby the Tribe would provide such services.

Response to Comment T6-85

Impacts cannot typically be "deferred." Rather, they occur as a consequence of a change in the environment, such as the construction or operation of a project. The commenter may have intended to state that mitigation would be deferred. If that is the intended meaning of the comment, it should be noted that mitigation would not be deferred. Draft EIS Section 5.0 describes the timing of individual mitigation measures. In the case of law enforcement, Final EIS Mitigation Measure 5.10.3 E. states: "*Prior to operation* [emphasis added] the Tribe shall enter into a service agreement to reimburse the Shasta County Sheriff's Office (SCSO) or another qualified agency for quantifiable direct and indirect costs incurred in conjunction with providing law enforcement services. Payments made in accordance with this agreement may be contributed, at least in part, through the Impact Mitigation Fund pursuant to Section 11 of the Tribal-State Compact. It should be noted that the existing County IGA described in Section 1.5.4 would fulfill this mitigation requirement. If the existing County IGA is terminated and a new agreement cannot be reached, the Tribe shall implement Public Safety Option 2 to construct and staff a Public Safety Building that will provide police, fire and emergency medical response services to the Strawberry Fields Site." Thus, in this case mitigation would occur prior to the operation of Alternatives A through D; therefore, no unmitigated impact would occur.

Please also see **General Response 3.6.3**, where the option (Option 2) of a Tribally constructed and funded Public Safety Building on the Strawberry Fields Site is described.

Response to Comment T6-86

As stated in Section 2.3.2 of the Draft EIS, there are no existing natural gas service lines connecting to the Strawberry Fields Site[11]. A description of existing facilities and possible improvements are included in Final EIS Section 4.14.2. The location of natural gas pipeline extensions would be determined closer to implementation of the project and prior to ground disturbing activities related to construction. Please refer to **General Response 3.7.2** pertaining to utilities and the anticipated providers. The Tribe shall contact the Utility Notification Center, which notifies utility service providers to mark or stake the horizontal path of underground facilities, provide information about the facilities, and/or give clearance to

[11] Source: PG&E, 2019. Gas Transmission Pipeline Map. Available electronically at: https://www.pge.com/en_US/safety/how-the-system-works/natural-gas-system-overview/gas-transmission-pipeline/gas-transmission-pipelines.page. Accessed on September 4, 2019.

dig. As discussed in Draft EIS and Final EIS Section 4.14.2, utility line extensions are not anticipated to result in adverse environmental effects.

Response to Comment T6-87

The equalization basin would be located within the area designated for Option 2 Water and Wastewater Facilities in Final EIS Figure 2.8-1. The environmental impacts from construction and operation of the optional wastewater treatment plant have been analyzed throughout the EIS.

Response to Comment T6-88

Draft EIS Table 3.11-7 has been revised to present noise levels from long term noise measurements in day-night (Ldn) noise descriptor values. All noise values can be found in Draft EIS Appendix G.

Response to Comment T6-89

The construction noise analysis in Final EIS Section 4.11 has been revised to address noise impacts from simultaneous operation of multiple pieces of construction equipment as outlined in the FTA Transit Noise and Vibration Impact Assessment Manual.[12]

Response to Comment T6-90

Draft EIS Section 4.11.1, subheader "Construction Vibration" does include evidence in the form of calculated vibration levels. Furthermore, Draft EIS Section 4.11.1 describes BMPs, including limiting construction to daytime hours to minimize sleep disturbance, that would reduce impacts to less-than-significant levels.

Response to Comment T6-91

As described in Draft EIS Section 4.11, noise impacts associated with increased traffic volumes on Bechelli Lane and on Adra Way were evaluated based on the roadway improvement project noise standards described in the Noise Elements of the City of Redding General Plan and the Shasta County General Plan. A description of these standards is provided in Draft EIS Table 3.11-6.

As described in Draft EIS Section 2.2.2, Bechelli Lane and Adra Way are the only roadway segments within the Off-site Access Improvement Areas. Therefore, Bechelli Lane and Adra Way were the only roadway segments evaluated using the City of Redding General Plan and the Shasta County General Plan roadway improvement project noise standards. Noise impacts associated with increased traffic volumes on all other road segments were evaluated based on the FHWA NAC standards presented in Draft EIS Table 3.11-4.

[12] Transit Noise and Vibration Impact Assessment, September 2018. Available online at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

Draft EIS Table 4.11-3 predicts that traffic noise levels along Churn Creek Road between Smith Road and Knighton Road and along Smith Road between Churn Creek Road and Adra Way would result in an audible increase in traffic noise levels under Site Access Option 2. However, resulting ambient noise levels on these two road segments would not exceed the FHWA NAC threshold of 67.0 dBA Leq for residential sensitive receptors. Therefore, noise impacts associated with increased traffic volumes under Site Access Option 2 would not have a significant impact on sensitive receptors in the vicinity of these roadways. No changes to this determination within the Draft EIS are warranted.

Response to Comment T6-92

As described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives.

Response to Comment T6-93

Please see **Response to Comment T6-31** and **General Response 3.12** regarding impacts to listed fish species and Critical Habitat.

Response to Comment T6-94

Please see the revised text in Final EIS Section 2.3.2, which now lists the heights of the various building components.

Response to Comment T6-95

Please see **General Response 3.13.1** regarding viewpoints from the perspective of persons on the Sacramento River.

Response to Comment T6-96

Please see **General Response 3.1.3** regarding why a supplemental EIS is not warranted. Contrary to the commenter's statements, baseline information, disclosure of potential impacts, and consideration of alternatives have all been extensively analyzed in the Draft EIS. These responses to comments and the Final EIS further clarify the information included in the Draft EIS.

Response to Comment T6-97

Please see **Response to Comments T6-08**, **T6-13**, **T6-16** and **T6-17** regarding the opinions rendered by GMA Advisors.

Response to Comment T6-98

Please see **Response to Comment T6-09** regarding the opinions rendered in this report.

Response to Comment T6-99

Please see **Response to Comments T6-08**, **T6-13**, **T6-16** and **T6-17** regarding the opinions rendered by GMA Advisors.

Response to Comment T6-100

Please see **General Response 3.5.4** regarding the consideration of a modified Alternative F for a Larger Expansion of the Existing Casino.

Response to Comment T6-101.1

Comment noted.

Response to Comment T6-101.2

Please see **Response to Comment A4-02** regarding the methodology employed in the TIS (Draft EIS Appendix F) and the Updated TIS (Final EIS Appendix Q) to estimate peak traffic flows.

Response to Comment T6-101.3

Please see **Response to Comment A4-17**. Consistent with the City's Guidelines, a 2-percent heavy vehicle percentage was assumed at most of the study facilities, the majority of which are "non-state facilities." It is important to note that 5-percent was used at the Interstate-5/South Bonnyview interchange for the Cumulative (2040) Conditions' analysis which includes the consideration of a diverging diamond interchange (DDI). As such, the analysis is considered to be appropriate in that it conservatively assumes a higher percentage under the critical 2040 interchange reconfiguration conditions.

Response to Comment T6-101.4

Please see **Response to Comment A4-02**. The *City of Redding Traffic Impact Analysis Guidelines* do not contemplate the development of gaming venues, which, as described in **Response to Comment A4-02**, generate traffic flows that peak at times that are different from most other commercial businesses. As described in **Response to Comment A4-02**, the methodology employed in the TIS and Updated TIS were designed to accurately model the traffic flows of the Proposed Project, which is a casino resort.

Response to Comment T6-101.5

Please see **Response to Comments A4-02** and **T6-101.4**.

Response to Comment T6-101.6

Please see **Response to Comments A4-02** and **T6-101.4**.

Response to Comment T6-101.7

At the time of scoping and initial preparation of the TIS (Draft EIS Appendix F for the Proposed Project (early-2016), the Highway Capacity Manual 2010 was the published standard from the Transportation Research Board. The 6th Edition was not released until October 2016 and was, therefore, not available for use in the TIS. Characterized as more of an "update" rather than a significant overhaul, the changes included in the 6th Edition would not significantly change the technical analyses completed as part of the TIS or Updated TIS

Response to Comment T6-101.8

Please note that the interpolation of volumes to establish Opening Year (2025) volumes was only employed for a subset of the study facilities. As noted on Page 5 in the Updated TIS (Final EIS Appendix Q), "Volumes for Intersections #10-23 were developed by linearly interpolating between existing and 2040 traffic volumes. Opening Year (2025) traffic volumes assume the full building of the River Crossing Marketplace, including a 152,101-square foot Costco, located in the northwest quadrant of the South Bonnyview Road/Interstate-5 interchange." These study intersections (#10-23) are located in the vicinity of the Win-River Casino site area and the Anderson site area, neither of which are the focus of the commenter's statements regarding the Proposed Project at the Strawberry Fields Site (please see **Response to Comment A4-02**). Nevertheless, it is important to note that the effect of known development activity is broadly understood to be focused on the South Bonnyview Road/Interstate-5 interchange area and is therefore captured in the methodology employed to establish Opening Year (2025) volumes. These development projects are not anticipated to have a meaningful effect on the traffic flows in the Win-River Casino and Anderson site areas. As a result, the application of linear interpolation considered to be the appropriate methodology for volume forecasting as it conservatively accounts for background traffic growth in the absence of known development activity. In other words, if the TIS or Updated TIS restricted Opening Year (2025) forecasts to only known development projects, it is likely that the resulting volumes would have been less than those developed using interpolation. Accordingly, the application of linear interpolation in the TIS and Updated TIS is conservative and appropriate in these circumstances. No further responses or actions are warranted.

As directed by the City, all 2040 volumes were obtained from Omni-Means' documentation, either the River Crossing Marketplace Specific Plan or the SCRTDM containing modifications (prepared by Omni-Means) to address specific impacts of development proposals within the vicinity of the Strawberry Fields site. These documents included the Omni-Means Interstate-5/South Bonnyview Interchange PSR Technical Memoranda 1-14 (May 6, 2016 – April 28, 2017), which was provided by the City.

All TIS forecast Saturday peak-hour volumes were established by applying a factor to the forecast weekday (Friday) PM peak-hour volumes. These factors were established based on the existing relationship between weekday (Friday) PM peak-hour and Saturday PM peak-hour. Traffic counts were collected in 2016 during Friday and Saturday PM peak-hours. A relative change calculation was performed for all movements at each study intersection to determine the appropriate factor for projecting Saturday forecast volumes from the weekday (Friday) forecast volumes. Please see the discussion on Page 37 of the Updated TIS (Final EIS Appendix Q) for additional information.

Response to Comment T6-101.9

Please see **Response to Comment T6-101.8** regarding how the Year 2040 Saturday volumes were developed.

Response to Comment T6-101.10

Consideration of Opening Year (2025) plus Proposed Project Conditions is considered to be the most comprehensive snapshot of realistic conditions anticipated to be realized upon opening of the project. Unlike "Existing plus Proposed Project" conditions, the use of "Opening Year" allows for comprehensive consideration of background traffic growth, traffic from known development activity, and the full effect of the Proposed Project.

Response to Comment T6-101.11

The following are responses to the suggested additional study intersections, organized by intersection location. No further responses or actions are warranted.

- Knighton Road Intersections, 3 – These additional facilities have been incorporated and are thoroughly evaluated in the Updated TIS (Final EIS Appendix Q).

- State Route-273/Market Street Intersections, 3 – As depicted in TIS and Updated TIS Figures 16 and 17, the addition of the Proposed Project is anticipated to add approximately 190 peak-hour trips to the network, north of South Bonnyview Road. While the three intersections suggested by the commenter (Kenyon, Breslauer, and Buenaventura) are all located along this stretch of State Route-273/Market Street, they are located 1-2 miles north of study intersection #1 (State Route-273/Bonnyview Road). As such, it is reasonable to anticipate that these trips will dissipate with the actual number of project trips along State Route-273/Market Street through this area to be much less than the volumes experienced at Intersection #1 (State Route-273/South Bonnyview Road) and the study facilities located south and east of these locations. In addition, project trips through this area are reasonably anticipated to be through trips, thereby minimizing their effect on these intersections' operations. Please note that the scope of the TIS (Draft EIS Appendix F), including the identification of study facilities, was coordinated during 2016 with the City and other stakeholders. The facilities included in the TIS are consistent with their input received during this consultative process. Please see **Response to Comment A4-02** for additional information on the consultative process.

- State Route-273/Market Street Intersections (Anderson), 4 – As depicted in TIS Figures 32 and 33, the addition of the Proposed Project is anticipated to add approximately 270 peak-hour trips to the network, north of North Street. While the four intersections suggested by the commenter (Briggs, 3rd, Ox Yoke, and Spring Gulch) are all located along this stretch of State Route-273/Market Street, they are located one-half to 1.5-miles north of study intersection #17 (State Route-273/North Street). As such, it is reasonable to anticipate that these trips will dissipate with the actual number of project trips along State Route-273/Market Street through this area to be much less than the volumes experienced at Intersection #17 (State Route-273/North Street) and the study facilities located east of these locations. In addition, any remaining project trips are

reasonably anticipated to be through trips, thereby minimizing their effect on these intersections' operations. As described above, please note that the scope of the TIS, including the identification of study facilities, was coordinated during 2016 with the City and other stakeholders. The facilities included in the TIS are consistent with their input received during this consultative process. Please see **Response to Comment A4-02** for additional information on the consultative process.

Response to Comment T6-101.12

Please see **Response to Comment A4-21** regarding intersection and freeway off-ramp queuing.

Response to Comment T6-101.13

Please see **Response to Comments A8-11** and **T6-101.03** regarding truck volumes.

Response to Comment T6-101.14

Please see **Response to Comment A4-02** regarding the consultation with the City when developing the scope of work for the TIS.

Response to Comment T6-101.15

Preparation of the TIS was initiated in 2016. As such, the Existing Conditions are representative of the conditions at that time (2016).

Response to Comment T6-101.16

Please see **Response to Comment A4-02** regarding the methodology used to estimate peak hour traffic generation.

Response to Comment T6-101.17

A scope of work was submitted to AES, the consulting firm that prepared the Draft EIS and Final EIS. However, the methodology used in the TIS and Updated TIS were developed through consultation with appropriate agencies, including the City. Please see **Response to Comment A4-02** regarding this consultative process. The scope of work is summarized in the TIS, the Updated TIS and these responses to comments.

Response to Comment T6-101.18

1. Please see **Response to Comment T6-101.7** regarding why it is not necessary to utilize the Highway Capacity Manual 6th Edition (2016).

2. Roadway segment counts, in addition to the intersection counts, were collected in July and September 2016 for the purpose of contributing to the understanding of the relationship between these sets of volumes. However, the roadway segment counts were not directly used in the TIS.

Rather, consistent with the state of the traffic engineering practice, peak-hour intersection turning movement counts were used to generate corresponding roadway segment volumes. For this reason, roadway segment traffic count sheets have been removed from the Updated TIS Appendix (Final EIS Appendix Q).

Please see **Response to Comment A4-02** regarding the methodology used to estimate peak hour traffic generation and adjustments made to 2016 traffic count data.

Please see **Response to Comments A8-11** and **T6-101.3** above regarding traffic count methodology for truck traffic.

3. The presence of Amtrak services in the general project vicinity is not relevant to the scope of the EIS traffic studies. As such, no additional response or actions are warranted.

4. The commenter is correct that some of the geometry in TIS Figure 4 was not correct. Figure 4 has been revised in the Updated TIS (Final EIS Appendix Q) to reflect the correct Synchro intersection geometry.

5. Intersection #19 (Interstate 5 southbound off-ramp at North Street) on Updated TIS, Figure 5 (Final EIS Appendix Q) has been updated accordingly to show "all way stop."

   Intersection #20 (McMurray Drive/Interstate 5 Northbound On-Ramp at North Street) has been coded with geometry that is different from the existing (2016) geometry due to coding preferences. However, Kimley-Horn has confirmed that the level of service results are equivalent.

   Intersection #21 (Oak Street at Balls Ferry Road) has been coded with geometry that is different from the existing (2016) geometry due to coding preferences. However, Kimley-Horn has confirmed that the level of service results are equivalent.

6. Intersection #13 (State Route 273 (Market Street) at Westside Road/Girvan Road) has been coded with geometry that is different from the existing (2016) geometry due to coding preferences. However, Kimley-Horn has confirmed that the level of service results are equivalent. Updated TIS Figure 6 has been revised to reflect the correct intersection geometry (Final EIS Appendix Q).

   Intersection #16 (State Route 273 (Market Street) at Happy Valley Road) was correctly coded in Synchro in the analysis. Please see Appendix B of Final EIS Appendix Q for Synchro output sheets. Updated TIS Figure 6 has been revised to reflect the correct intersection geometry (Final EIS Appendix Q).

7. Consistent with the City's Traffic Impact Analysis Guidelines, and in a manner consistent with other recently completed traffic studies, Level of Service D was applied to the south Bonnyview Road corridor as it is considered to be a "river-crossing street corridor" as specified in **Section**

4.4 of the City's Guidelines. Please see TIS and Updated TIS, Table 5 for additional information (Final EIS Appendix Q).

8. Signal warrant worksheets for Existing, Opening Year, and Cumulative Conditions have been included in Appendix C of the Updated TIS (Final EIS Appendix Q).

9. Updating "Church Creek Road west of Alrose Lane" to "Church Creek Road east of Alrose Lane" has been incorporated in the Updated TIS where appropriate (Final EIS Appendix Q).

10. Updating the Peak-Hour Columns to show "FRI" and "SAT" as opposed to "AM" and "PM" has been incorporated in the Updated TIS where appropriate (Final EIS Appendix Q).

11. Please see **Response to Comment T6-101.8** above regarding the source of Opening Year 2025 volumes. Please see Page 36 of the Updated TIS for more information on the representation of projects in the area. As described therein, the cumulative 2040 traffic volumes were sourced directly from the 2017 *River Crossing Marketplace Specific Plan Traffic Impact Analysis Report* and the Shasta County Regional Travel Demand Model (SCRTDM), assuming the full buildout of the River Crossing Marketplace.

12. Cumulative (2040) Conditions reflect the findings of the "Bonnyview Interchange (Exit 675) Improvements Project Study Report – Project Development Support" (PSR_PDS Preferred Alternative 4B) prepared by the City for Caltrans. As such, the subject intersections' operations are shown to improve between 2025 and 2040 as a result of this revised interchange configuration in which a diverging diamond interchange with roundabouts is assumed to be constructed. This preferred alternative's geometrics greatly improves the operations for all left-turn movements through the interchange area, including Intersection #4 (Bonnyview Road at Intersetate-5 SB Ramps) and Intersection #6 (South Bonnyview Road at Churn Creek Road). Please see Appendix E of the Updated TIS (Final EIS Appendix Q) for geometry of the diverging diamond interchange. As per the *River Crossing Marketplace Specific Plan EIR*, "Under the Year 2040 with Rancheria plus Project scenario…cumulative impacts at intersection #5 [South Bonnyview Road/Bechelli Lane] would be mitigated with implementation of Mitigation Measure TRANS-1.1 [Reconstruct the intersection and approaches into a four-leg, two-lane roundabout in accordance with the specifications of the City Engineer]." The City provided improvement plans for the construction of South Bonnyview Road improvements at Bechelli Lane and the I-5 interchange ramps, the combination of which are understood to be representative of the aforementioned "TRANS-1.1." These improvements have been fully constructed and the facilities were opened to traffic in November 2022. Accordingly, the Proposed Project has no mitigation responsibility at this intersection and the Updated TIS reflects these changes (Final EIS Appendix Q). Please see **Response to Comment A4-02** for further information.

13. Please see **Response to Comment T6-101.14**. Due to the complexity of the planned Interstate-5/South Bonnyview Road interchange configuration (diverging diamond with roundabouts), it was collectively agreed to with the City that VISSIM is the appropriate analysis tool for the operations analysis. The TIS and Updated TIS employed VISSIM in a manner consistent with the

City's methodology, as employed by its consultant in the preparation of the Project Study Report (PSR) that was reviewed and approved by Caltrans. Please see Response to Comment A4-02 for additional information regarding the interagency collaborative process.

14. Regarding the comparative operation of the baseline freeway facilities documented in Table 15 of the Updated TIS, the Cumulative (2040) conditions' results reflect anticipated improvements through the study area. Please note that Caltrans is planning to widen I-5 through this area to three lanes in each direction by 2040. (Source: Caltrans, Redding to Anderson Six Lanes – RASL, accessed online at: https://dot.ca.gov/caltrans-near-me/district-2/d2-projects/d2-redding-to-anderson-six-lanes-rasl).

15. In an effort to be conservative, the TIS analysis assumes that the addition of the Interstate-5 interchange at Smith Road does not include a shift of background traffic. This approach is conservative because the lack of shift assumption implies that the well-established congestion at the South Bonnyview Road interchange is not alleviated by the new interchange. In addition, due to the isolated location of the new interchange and the fact that Smith Road has limited connectivity, because it only extends from just west of Interstate-5 to Churn Creek Road. Thus, it is anticipated that a less-than-discernable amount of background traffic would use this route.

16. Please see **Response to Comment A4-02** regarding the methodology employed in the TIS (Draft EIS Appendix F) and the Updated TIS (Final EIS Appendix Q) to estimate peak traffic flows.

17. Please refer to **Response to Comment A4-02** regarding casino trip rates and auto occupancy assumptions. Please see the "Project Trip Generation" discussion contained in the Updated TIS on Page 54. Daily rates are provided in Table 16 of the Updated TIS.

18. Please refer to **Response to Comment T6-101.11**. Comment noted as duplicate of **Comment T6-101.11**.

19. In all cases, "Weekday" refers to Friday.

20. Please see **Response to Comment A4-23** regarding the implementation of off-site mitigation improvements.

21. A fair share percentage calculation summary has been prepared and is included as part of Appendix J of the Updated TIS (Final EIS Appendix Q).

22. Comment noted.

23. In regard to the commenter's statement about the reported level of service for two-way stop-controlled intersections, the "correct" LOS is displayed. Consistent with the *City's Traffic Impact Analysis Guidelines*, the worse minor-street movement's LOS was reported for the two-way stop-controlled intersections.

24. Comment noted. As of the date of the commenter's June 17, 2019 comment letter, the commenter had not provided any supporting data.

25. Comment noted. As of the date of the commenter's June 17, 2019 comment letter, the commenter had not provided any supporting data.

26. Comment noted regarding the impacts of the Proposed Project on intersections 2, 3, 27, and 32. As of the date of the commenter's June 17, 2019 comment letter, the commenter had not provided any supporting data. Please also see **Response to Comment T6-101.11** regarding additional intersections that were analyzed in the Updated TIS.

27. Comment noted regarding future impacts of the Proposed Project on intersections 6 and 7. As of the date of the commenter's June 17, 2019 comment letter, the commenter had not provided any supporting data.

28. Comment noted for comparison between Existing (2019) intersection level of service analysis prepared by Linscott, Law & Greenspan and the Existing (2016) intersection level of service analysis prepared by Kimley-Horn. As of the date of the commenter's June 17, 2019 comment letter, the commenter had not provided any supporting data.

29. Please see **Response to Comment T6-101.14** for application of minimum level of service on intersections 2, 3, 6, and 29**.**

30. Comment noted regarding Linscott, Law & Greenspan's assessment of Kimley-Horn's traffic study. As of the date of the commenter's June 17, 2019 comment letter, the commenter had not provided any supporting data.

31. Comment noted regarding review of the daily roadway segment counts from Appendix A. As of the date of the commenter's June 17, 2019 comment letter, the commenter had not provided any supporting data.

COMMENT LETTER T7: NOR REL MUK WINTU NATION

Response to Comment T7-01

Please refer to **Response to Comment T4-01** and **T6-63** regarding site CA-SHA-266.

Response to Comment T7-02

Comment noted. Please refer to **Response to Comments T4-02** regarding the SHPO consultation process. Response to Comment T4-02 addresses issues related to assessment of cultural significance of CA-SHA-4413.

Response to Comment T7-03

Comment noted. Please refer to **Response to Comments T7-01**, **T7-02**, **T4-03**, and responses to comments from the Paskenta Band of Nomlaki Indians (Comment Letter T6).

COMMENT LETTER I1: SEAN BEAM, FREDERICKS PEEBLES & MORGAN LLP

Response to Comment I1-01

Comment noted. The letter attached by the commenter was submitted as Comment Letter I1. Please see **Responses to Comments I1-02** through **I1-05**.

Response to Comment I1-02

Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS.

Response to Comment I1-03

Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS.

Response to Comment I1-04

Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS.

Response to Comment I1-05

Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. It is noted that the commenter requests a meeting with Kevin Washburn, Amy Dutschke, Dr. Virgil Akins, and Joseph La Perle.

COMMENT LETTER I2: JIM MORROW

Response to Comment I2-01

Please refer to **General Response 3.1.1** regarding the Draft EIS comment period.

COMMENT LETTER I3: BUCK & SUE LANG

Response to Comment I3-01

The Draft EIS, Final EIS and these Responses to Comments address the environmental subject areas listed by the commenter. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments. Please refer to **General Response 3.8.2** regarding agricultural land.

Response to Comment I3-02

Please refer to **General Response 3.12.1** and **3.12.2** pertaining to impacts to special-status species and effects to habitats.

COMMENT LETTER I4: ALAN HILL

Response to Comment I4-01

Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments and **General Response 3.6.3** regarding crime and the provision of law enforcement, fire and EMS .

COMMENT LETTER I5: AMBAR MOLTAMMEO

Response to Comment I5-01

Commenter expresses support for the Proposed Project. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I6: BONNIE HURLHEY

Response to Comment I6-01

Commenter expresses support for the Proposed Project. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I7: BRYAN CRUM

Response to Comment I7-01

Please see **General Response 3.6.3** regarding crime, homelessness and other undesirable outcomes. Please see **General Response 3.6.2** regarding substitution effects to local businesses. Please see **General Response 3.6.3** regarding potential effects to property values.

COMMENT LETTER I8: DALE SMITH

Response to Comment I8-01

Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments and **General Response 3.13** regarding aesthetics.

COMMENT LETTER I9: DANIKA ADAMS

Response to Comment I9-01

Please refer to **General Responses 3.14** regarding traffic, **General Response 3.12.1** regarding special-status species and **General Response 3.8.2** regarding agricultural land.

COMMENT LETTER I10: DENNIS GRADY

Response to Comment I10-01

Please refer to **General Response 3.5.4** regarding project alternatives, including alternate sites. Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I11: DEVIN RYAN

Response to Comment I11-01

Commenter expresses support for the Proposed Project. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I12: DIANA KIRSCHMAN

Response to Comment I12-01

Please refer to **General Response 3.14** regarding traffic and **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services.

COMMENT LETTER I13: DONNA BUCHANAN

Response to Comment I13-01

Commenter expresses support for the Proposed Project and notes their opinion that all the environmental impacts have been addressed. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I14: DONNA FITZPATRICK

Response to Comment I14-01

Commenter expresses support for the Proposed Project. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I15: ED & CAROLYN SHAW

Response to Comment I15-01

Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. Please see **General Response 3.15** regarding noise from the amphitheater. Please refer to **General Responses 3.12.1** and **3.12.2** concerning impacts to special-status species and habitats.

COMMENT LETTER I16: GARY MORRIS

Response to Comment I16-01

Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I17: JASMINE ROMERO

Response to Comment I17-01

Commenter expresses support for the Proposed Project. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I18: JEAN FELLMAN

Response to Comment I18-01

Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, and signage elements. Please see **General Responses 3.15** regarding traffic noise and noise from the proposed amphitheater.

COMMENT LETTER I19: JEANNIE WINSTEAD

Response to Comment I19-01

Please see **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services. Please refer to **General Response 3.14** regarding traffic. Please also refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

Response to Comment I19-02

Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please see **General Response 3.5.2** regarding the range of alternatives. Please see **General Response 3.6.3** regarding crime, substance abuse, and homelessness. Please see **General Response 3.8.2** regarding agricultural land. Please also refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I20: JENNI PATTERSON

Response to Comment I20-01

Commenter expresses support for the Propose Project. Please see **General Response 3.1.2** regarding the thoroughness and completeness of the Draft EIS. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I21: KAREN BITHER

Response to Comment I21-01

Please refer to **General Response 3.13.2** regarding lighting and glare. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I22: KIANNA BENNER

Response to Comment I22-01

Commenter expresses support for the Proposed Project. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I23: LARRY FULTZ

Response to Comment I23-01

Commenter expresses support for the Proposed Project. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I24: MAE GUTHRIE

Response to Comment I24-01

See **General Response 3.14** regarding the interchange at Interstate-5 and Bonnyview Road.

COMMENT LETTER I25: MICHAEL SCHRANER

Response to Comment I25-01

Please refer to **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime, and the provision of law enforcement services. Please refer to **General Response 3.6.4** regarding taxes and fiscal effects. Please refer to **General Response 3.13** regarding aesthetic impacts.

COMMENT LETTER I26: PATRICIA FURNARI

Response to Comment I26-01

Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I27: RICH TODD

Response to Comment I27-01

Please refer to **General Response 3.14** regarding traffic. Roadway access points to the Strawberry Fields Site are discussed and analyzed in Draft and Final EIS Sections 2.2, 2.3 and 4.8, as well as the TIS (Draft EIS, Appendix F) and Updated TIS (Final EIS Appendix Q).

COMMENT LETTER I28: TOM KIRSCHMAN

Response to Comment I28-01

Please refer to **General Response 3.14** regarding traffic. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I29: VICKI KILLION

Response to Comment I29-01

Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I30: WENDALYN JESSON

Response to Comment I30-01

Please refer to **General Response 3.8.2** regarding use of agricultural land. Please see **General Responses 3.5.2** and **3.5.4** regarding the range of alternatives analyzed, including the various project sites.

COMMENT LETTER I31: WENDY FOOH

Response to Comment I31-01

Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I32: UNKNOWN

Response to Comment I32-01

Please refer to **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services.

COMMENT LETTER I33: DEBE HOPKINS

Response to Comment I33-01

Commenter expresses support for the Proposed Project. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I34: MICHAEL CROOK

Response to Comment I34-01

Commenter expresses support for the Proposed Project. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Please see **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City. Please see **Response to Comment A4-01** regarding the Civic Auditorium.

COMMENT LETTER I35: SAVANNA EDWARDS

Response to Comment I35-01

Commenter expresses support for the Proposed Project. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please also refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I36: DANIEL MCGANN & BLOSSOM HAMUSEK

Response to Comment I36-01

Commenter expresses support for the Proposed Project. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I37: DON BARICH

Response to Comment I37-01

Please see **General Response 3.15** regarding noise from the amphitheater, **General Response 3.14** regarding traffic, and **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services.

COMMENT LETTER I38: MICHAEL MIDDENDORP

Response to Comment I38-01

Commenter expresses support for the Proposed Project. Please see **General Response 3.14** regarding traffic. Please refer to **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I39: HAZEL HUGHES

Response to Comment I39-01

Please refer to **General Response 3.14** pertaining to traffic, **General Response 3.15** regarding traffic and amphitheater noise, **General Response 3.12.1** and **3.12.2** for comments regarding eagles, salmon, and other wildlife/habitats. Please also refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, and signage elements.

COMMENT LETTER I40: SHELLY HUTCHINSON

Response to Comment I40-01

Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements. Please see **Response to Comment A4-01** regarding the Civic Auditorium.

Response to Comment I40-02

Please see **Response to Comment A4-01** regarding the Civic Auditorium. Please see **General Response 3.5** regarding the range of alternatives analyzed.

COMMENT LETTER I41: KATHY GRISSOM

Response to Comment I41-01

Please refer to **General Response 3.8.2** pertaining to use of agricultural land and **General Response 3.12.2** regarding wildlife habitats. Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements. Please see **General Response 3.16** regarding air quality and climate change. Please refer to **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City. Also refer to **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services.

COMMENT LETTER I42: LANG M. DAYTON, CHAIRMAN, TRAILS & BIKEWAYS COUNCIL OF GREATER REDDING

Response to Comment I42-01

Please refer to **General Response 3.1.1** regarding the Draft EIS comment period.

COMMENT LETTER I43: PAM HUGHES

Response to Comment I43-01

Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS.

COMMENT LETTER I44: TRISH STOFFERS

Response to Comment I44-01

Commenter expresses support for the Proposed Project. Please refer to **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Please refer to **General Response 3.2.1** regarding expressions of opinion.

COMMENT LETTER I45: EDMOND BREWER

Response to Comment I45-01

Commenter expresses support for the Proposed Project. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I46: CHERYL SCHMIT, DIRECTOR, STAND UP FOR CALIFORNIA

Response to Comment I46-01

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0. See **General Response 3.2.2** regarding why the BIA has the statutory authority to take lands into trust in this circumstance.

Response to Comment I46-02

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0. See **General Response 3.2.2** regarding why the BIA has the statutory authority to take lands into trust in this circumstance.

Response to Comment I46-03

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS.

Response to Comment I46-04

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS.

Response to Comment I46-05

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0. See **General Response 3.2.2** regarding why the BIA has the statutory authority to take lands into trust in this circumstance.

Response to Comment I46-06

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0. See **General Response 3.2.2** regarding why the BIA has the statutory authority to take lands into trust in this circumstance. As described therein, the Proposed Project would occur on land held in trust by the federal government (i.e., tribal land).

COMMENT LETTER I47: BOB MADGIC

Response to Comment I47-01

Comment noted. Please refer to **General Response 3.12.1** and **3.12.2** pertaining to impacts to special-status fish species and habitats. Construction of the Proposed Project, including streambank stabilization, was evaluated for potential impacts to listed fish species and critical habitat in consultation with the National Marine Fisheries Service (NMFS; Draft EIS Appendix D-2). NMFS reviewed the project under ESA Section 7(a)(2) and MSMA in a concurrence letter (May 7, 2019) and determined the proposed actions were not likely to affect listed fish species with the inclusion of mitigation measures listed in Final EIS Appendix O-3. Subsequently, the streambank stabilization methods were refined to further lessen their potential impact on the streambank and Waters of the U.S. Please see **General Response 3.11** regarding streambank stabilization.

COMMENT LETTER I48: DALE WIDNER

Response to Comment I48-01

Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please see **General Response 3.5.4** regarding the range of alternatives analyzed in the Draft EIS, and why the Knighton Road site was not one of the alternatives analyzed.

Response to Comment I48-02

Please see **General Response 3.5.4** regarding the range of alternatives analyzed in the Draft EIS, and why the Knighton Road site was not one of the alternatives analyzed.

Response to Comment I48-03

Please see **General Response 3.5.4** regarding the range of alternatives analyzed in the Draft EIS, and why the Knighton Road site was not one of the alternatives analyzed. Comment noted. Please see **Response to Comment I48-01** above.

COMMENT LETTER I49: L.M.

Response to Comment I49-01

Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I50: J. SCOTT FOOTT

Response to Comment I50-01

Please see **General Response 3.14** regarding traffic and **General Response 3.15** regarding noise from traffic and the proposed amphitheater. Please see **Response to Comment A4-24** regarding potential feasibility issues associated with the construction of traffic mitigation improvements, including construction of a second westbound left turn lane at this intersection.

Response to Comment I50-02

Please see **General Response 3.15** regarding noise from the proposed amphitheater. As described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives.

Response to Comment I50-03

As described in Draft EIS Section 2.3.2, one option for wastewater treatment and disposal is connection to the City of Redding conveyance system and wastewater treatment plant. As identified in Final EIS Appendix M, Section 5.3, the Westside Interceptor currently exceeds its capacity during storm events. The Westside Interceptor Phase III project is planned to expand the facility's capacity. Connection to the City's system would be subject to the City's approval and payment of connection and service fees.

Response to Comment I50-04

Treated effluent would not adversely impact water quality or aquatic habitat within the Sacramento River. Disposal would occur through landscape irrigation and percolation in leach fields and would not be discharged into the river. Effluent would be treated to meet disinfected tertiary recycled water standards under Title 22 of the California Code of Regulations. Effluent would be of high quality and would not have the potential to significantly degrade surface water or groundwater quality. As described in Final EIS Appendix M, Section 5.1.3, total nitrogen levels in effluent would be less than 10 milligrams per liter, which is the Safe Drinking Water Act maximum contaminant level for nitrate (as nitrogen). The leach fields would be at least 0.4 mile from the Sacramento River. This distance would ensure a buffer exists between the leach fields and the river.

Response to Comment I50-05

Subsequent to the publication of the Draft EIS, percolation tests were performed at the project site. Results from these tests are included in Final EIS Appendix M. As described therein, most of the leach field area is soil that falls within the standard range for suitable percolation conditions.

Response to Comment I50-06

As identified in Section 2 of the EIS, the optional leach fields under Alternatives A – D at the Strawberry Fields site would be located outside of the 100-year floodplain. Shasta County's 2018 Local Agency Management Program for Onsite Wastewater Treatment Systems was used as a basis of conceptual design. Alternative E (Anderson Site) would be served by the City of Anderson's sewer system rather than an on-site wastewater treatment and disposal system.

COMMENT LETTER I51: JACQUELYN JANSEN

Response to Comment I51-01

Please refer to **General Response 3.14** regarding traffic. Please see **General Responses 3.12.1** and **3.12.2** regarding special status-species and potential effects on habitat. Please refer to **General Response 3.16** regarding air quality and climate change, **General Response 3.15** regarding noise from traffic and the proposed amphitheater, **General Response 3.9** pertaining to impacts to water supply, **General Response 3.13.3** regarding light pollution, and **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services. Please also see **General Response 3.6.2** concerning substitution effects to local businesses.

COMMENT LETTER I52: KATHYRN PATTERSON

Response to Comment I52-01

Please refer to **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services. Please refer to **General Response 3.8.2** pertaining to use of agricultural land and **General Response 3.12.2** regarding wildlife habitats. Please see **General Response 3.14** pertaining to traffic and **Response to Comment A6-10** regarding the Carr Fire and its potential effects on housing. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I53: LYNN CLEVENGER

Response to Comment I53-01

Commenter expresses support for the Proposed Project, but with reservations regarding traffic issues. Please refer to **General Response 3.14** regarding traffic. Please see **Response to Comment A4-23** regarding how specific traffic improvements would be implemented and constructed. Although the Tribe would provide funding, actual construction of the improvements is the purview of the local transportation agencies.

COMMENT LETTER I54: ROBERT FULLER

Response to Comment I54-01

Please refer to **General Response 3.14** regarding traffic. Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements. Please see **General Response 3.6.2** regarding substitution effects to local businesses. The commenter is correct that the Proposed Project is anticipated to be profitable, which is consistent with most commercial projects. Please refer to **General Response 3.6.4** regarding taxes and fiscal effects. Please also see **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services.

COMMENT LETTER I55: CATHY WHEELER

Response to Comment I55-01

Please see **General Response 3.15** regarding noise from the proposed amphitheater. As described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives.

COMMENT LETTER I56: DENNIS DANIEL

Response to Comment I56-01

Commenter expresses support for the Proposed Project. Please refer to **General Response 3.14** regarding traffic impacts**.** Please also see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I57: IRENE JACKSON

Response to Comment I57-01

Please refer to **General Response 3.14** regarding traffic. Traffic impacts would be less than significant with the implementation of mitigation measures identified in Draft and Final EIS Section 5.8.

COMMENT LETTER I58: CHRISTINE MIILLE

Response to Comment I58-01

Please see **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services. Please see **General Response 3.6.2** regarding substitution effects to local businesses. Please refer to **General Response 3.8.2** pertaining to the use of agricultural land

COMMENT LETTER I59: KIMBERLY MARE & DAVID BAILEY

Response to Comment I59-01

Please refer to **General Response 3.14** pertaining to traffic impacts. Please see **General Response 3.15** regarding noise from the proposed amphitheater. As described in **Response to Comment A4-01**, the

amphitheater is no longer part of any of the project alternatives. Please refer to **General Responses 3.5.2** and **3.5.4** regarding the range of alternatives and alternative locations analyzed in the Draft EIS.

COMMENT LETTER I60: DENAL & JOHN JURIN

Response to Comment I60-01

Commenter expresses support for the Proposed Project. As described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives. Please see **General Response 3.14** pertaining to traffic impacts. Please also see **General Response 3.6.** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services.

COMMENT LETTER I61: MARJORIE RIFFEL

Response to Comment I61-01

Please refer to **General Response 3.13.1** regarding project impacts on aesthetics and visibility at S. Bonnyview (Viewshed E).

Response to Comment I61-02

Please refer to **General Response 3.14** regarding traffic.

Response to Comment I61-03

Please refer to **General Response 3.12.1** and **3.12.2** regarding impacts to special-status species and habitats. Please see **General Response3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please also see **General Response 3.5.4** regarding the range of alternative locations analyzed in the Draft EIS.

COMMENT LETTER I62: MIMI RAMSEY

Response to Comment I62-01

The commenter seems to suggest a modified system of southbound Interstate-5 ramps to access the project site. The commenter specifically recommends a roadway to be located under the existing Bonnyview Road overcrossing intersecting with Bechelli Lane in the vicinity of SunnyHill Lane (and thereby providing access to the Bechelli Lane businesses and to Bonnyview Road). The second component of the commenter recommendation involves access to the project site from the southbound Interstate-5 on-ramp. Notwithstanding the engineering feasibility of constructing such a system of ramps (note that, as suggested, these two ramps would be required to cross each other thereby introducing the need for grade separation using a bridge structure), the additional cost associated with these ramps would be excessive because, as documented in the Updated TIS, the existing roadway network would provide access to both the Proposed Project and the surrounding uses with acceptable levels of service and traffic operations. Furthermore, such a combination of ramps appears to be inconsistent with Caltrans' published design standards for freeway interchanges (i.e., ramp configurations would be inconsistent with driver expectation). Please see **Response to Comment A8-09** regarding the feasibility of a more comprehensive

frontage road system to access the project site. Please also see **Response to Comment A4-23** regarding the implementation of off-site mitigation improvements.

Response to Comment I62-02

General Response 3.15 regarding noise from traffic and the proposed amphitheater. As described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives.

COMMENT LETTER I63: ANNE WALLACH THOMAS, DIRECTOR, SHASTA LIVING STREETS

Response to Comment I63-01

Comment noted. Please refer to **Response to Comments I63-02** through **I63-08** below.

Response to Comment I63-02

Comment noted. Please see **Response to Comment I63-04** below for further discussion.

Response to Comment I63-03

Comment noted. Please refer to **General Response 3.14** pertaining to traffic. Also, as stated in the Draft EIS, section 4.8.2, Alternative A would not hinder roadway improvements or the existing transit services in the vicinity of the Strawberry Fields Site. Implementation of project improvements include development of sidewalks and shoulders with adequate widths to accommodate bicyclists along Bechelli Lane. Although Alternative A would generate increased traffic, mitigation measures identified in Section 5.8 of the Draft EIS and Final EIS would result in less-than-significant impacts to traffic. The proposed project would not create major safety, health, or equity issues for residents or visitors biking and walking.

Response to Comment I63-04

It is important to note that the Proposed Project, while somewhat larger, would replace the existing Win-River Casino. As a result, it is reasonable to conclude that a large portion of the project's trips are already on the surrounding roadway contributing to the safety of those walking, biking, and crossing busy intersections. The concentration of project trips along Bechelli Lane and in the immediate vicinity of I-5 would be accompanied by appropriate mitigations to alleviate traffic congestion, all of which are anticipated to be designed and constructed in a manner consistent with City, Shasta County, and Caltrans' standards. These standards include provisions for pedestrian and bicycle access, circulation, and safety including sidewalks, crosswalks and signal timing strategies, and signing/lighting. Specifically, Bechelli Lane extension and improvements would include these provisions thereby providing a viable route to connect the project site to South Bonnyview Road for all travel modes.

Please also see **Response to Comment A4-22** regarding consistency with the 2019 Shasta County *Go Shasta Regional Active Transportation Plan*, and **Response to Comment A8-03** regarding bicycle-oriented improvements

Response to Comment I63-05

Please see Draft and Final EIS Sections 4.7 for analyses on the impact of low-income and disadvantaged members of the community.

Response to Comment I63-06

Refer to **Response to Comment A8-9** regarding the feasibility of a more comprehensive frontage road system to access the project site. Please see **Response to Comment I63-04** regarding provisions for pedestrian and bicycle access, circulation, and safety**.**

The discussion on Page 178 of the Updated TIS (Final EIS, **Appendix Q**) pertaining to alternate travel modes has been updated to address impacts of the 2019 Shasta County *Go Shasta Regional Active Transportation Plan*. The commenter is correct that page 62 of the Go Shasta Regional Active Transportation Plan (accessed online February 6, 2020 at: https://www.srta.ca.gov/DocumentCenter/View/4772/GoShasta_Regional_ATP_no_appendices_8-2019) illustrates a bike path (specifically the Regional Active Transportation Network – Recommended Bikeway Network) that is recommended to run (from north to south) from Bonnyview Road south along the western edge of the Sacramento River. In the vicinity of the island located west of the Strawberry Fields Site, the path would turn east, first crossing over the river channel to the island, and then from the island across the main Sacramento River channel to the east bank of the Sacramento River. The path would then turn and proceed south along the east bank of the river. The Bikeway Network map is not detailed enough to determine exactly where the recommended path would land on the Strawberry Fields Site, but it appears to be towards the southern-most location of project improvements and approximately several hundred feet to the west. As described in the Go Shasta Regional Active Transportation Plan, these are recommended bicycle path improvements, subject to change due to various factors, including feasibility. Elements of the recommended bikeway network will likely change and evolve prior to their construction. This particular alignment of the Recommended Bikeway Network would be more challenging and complex than most, due to the two proposed river crossings.

Similarly, the commenter is correct that Page 16 of the City of Redding's *Active Transportation Plan* (accessed online February 10, 2020 at: https://www.dropbox.com/s/mqf1lbu1tdak5bu/2018%20City%20of%20Redding%20ATP.pdf?dl=0) describes a shared use path that is recommended to run along South Bonnyview Road. Furthermore, Page 24 of the City of Redding's *Active Transportation Plan* illustrates a planned bicycle network north of the Strawberry Fields Site. The *Plan* (specifically the Planned Bikeway Network) illustrates buffered bike lanes recommended on Bechelli Lane (north of South Bonnyview Road) and buffered bike lanes and a shared use path recommended along South Bonnyview Road (west of Bechelli Lane to Churn Creek Road). The Planned Bikeway Network does not show the recommended bicycle path improvements intersecting with the Strawberry Fields Site. The proposed Strawberry Fields site does not preclude the recommended improvements from occurring.

Additionally, the commenter is correct that the *Go Shasta Regional Active Transportation Plan* (accessed online February 10, 2020 at: https://www.srta.ca.gov/DocumentCenter/View/4772/GoShasta_Regional_ATP_no_appendices_8-2019)

indicates bicycle and pedestrian improvements along North Street in the vicinity of the Anderson Site. Specifically, Page 62, illustrates a separated bikeway that is recommended to run along North Street, between McMurry Drive and SR 273. An additional bike lane is recommended on Balls Ferry Road and on McMurry Drive in the vicinity of the I-5 interchange. Page 63 depicts recommendations to the pedestrian network, including a recommendation for a Commercial/Civic Corridor along North Street. Page 63 also includes recommendations for intersection improvements at the intersection of Market Street with SR 273 and interchange improvements at the southbound and northbound I-5 interchanges on North Street and Balls Ferry Road. The Recommended Bikeway Network and the Recommended Pedestrian Network maps do not show the recommended improvements intersecting with the Anderson Site. The proposed Anderson site does not preclude the recommended improvements from occurring.

As with all improvements proposed by local agencies, the Tribe is committed to working with the City and County regarding projects that would be beneficial to the community (see Comment Letter T5, comment T5-03). Such projects include the Recommended Bikeway and Pedestrian Network.

Please note that the Cumulative (2040) Conditions reflect the findings of the "Bonnyview Interchange (Exit 675) Improvements Project Study Report – Project Development Support" (PSR_PDS Preferred Alternative 4B) prepared by the City for Caltrans. As such, the City's envisioned South Bonnyview Road/I-5 interchange improvements have been comprehensively included in the TIS and Updated TIS and the noted multi-modal enhancements are therefore incorporated as well. As per the *River Crossing Marketplace Specific Plan EIR*, "Under the Year 2040 with Rancheria plus Project scenario…cumulative impacts at intersection #5 [South Bonnyview Road/Bechelli Lane] would be mitigated with implementation of Mitigation Measure TRANS-1.1 [Reconstruct the intersection and approaches into a four-leg, two-lane roundabout in accordance with the specifications of the City Engineer]." The City provided improvement plans for the construction of South Bonnyview Road improvements at Bechelli Lane and the I-5 interchange ramps, the combination of which are understood to be representative of the aforementioned "TRANS-1.1." These improvements have been fully constructed and the facilities were opened to traffic in November 2022. Please see **Response to Comment A4-02** for further information.

As described in **Response to Comment A4-23**, all proposed mitigation improvements would be constructed in a manner consistent with the applicable agencies' approved standards and adopted plans.

Response to Comment I63-07

Please see **Responses to Comments I63-4 and I63-6** regarding bicycle networks and pedestrian routes.

Response to Comment I63-08

Commenter's inclusion of materials from its business materials and brochures is noted.

COMMENT LETTER I64: MARY OCASION

Response to Comment I64-01

As described in Draft EIS Section 2.3.2, one option for wastewater treatment is an on-site wastewater treatment plant. Effluent would be treated to meet disinfected tertiary recycled water standards under Title 22 of the California Code of Regulations. Effluent would be used for landscape irrigation and the remainder would be disposed in a leach field. For Alternative A, approximately 33 acres of leach field would be required. This includes 100 percent replacement area and 20 percent redundancy in compliance with County standards. Effluent would be of high quality and would not have the potential to significantly degrade surface water or groundwater quality. Please see **General Response 3.10** regarding wastewater treatment and disposal.

Response to Comment I64-02

As described in Section 4.3 of the Draft EIS, all stormwater runoff from the development area would be infiltrated on the site and would not discharge to the Sacramento River or Anderson Cottonwood Irrigation District facilities. As described in Final EIS Appendix N, the development would use catch basin filters, infiltration trenches and vegetated swales to filter stormwater and remove sediment and contaminants. Stormwater runoff would not cause pollution of the Sacramento River or add storm flows to the river.

Response to Comment I64-03

Please refer to **General Response 3.8.2** pertaining to the use of agricultural land.

Response to Comment I64-04

Please see **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements. Please refer to **General Response 3.8.1** and **3.8.2** for comments regarding zoning and farmland and **General Response 3.15** for comments concerning amphitheater noise.

Response to Comment I64-05

Please see **General Response 3.9** regarding water supply. As described in Final EIS Section 4.3, the use of groundwater to provide the water supply of Alternatives A through D does not have the potential to significantly impact wells in the Churn Creek Bottom or the Sacramento River.

Response to Comment I64-06

Please refer to **General Response 3.16** regarding air quality, including the potential effects of climate change.

Response to Comment I64-07

Please refer to **General Response 3.14** regarding traffic.

COMMENT LETTER I65: MIMI MOSELEY

Response to Comment I65-01

Commenter expresses support for the Proposed Project. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements. Please see Response to **Comment A4-01** regarding the event center and conference center.

COMMENT LETTER I66: RICK RAMOS

Response to Comment I66-01

Commenter expresses support for the Proposed Project. Refer to **General Response 3.2.1** regarding expressions of opinion.

COMMENT LETTER I67: TOM REEMTS, CHURN CREEK BOTTOM: HOME OWNERS AND FRIENDS ORG.

Response to Comment I67-01

Please refer to **General Response 3.8.2** regarding the use of agricultural land and **General Response 3.4** concerning project design and architectural style. Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements. Please see **General Response 3.16** regarding air quality and climate change. Please see **General Response 3.11** regarding issues related to flooding, the floodplain, setbacks from the Sacramento River, and water quality. Please refer to **General Response 3.10** concerning wastewater. Please see **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services. Please refer to **General Response 3.14** regarding traffic. Please also refer to **Response to Comments I93-01** through **I93-13** regarding Speak Up Shasta comments.

COMMENT LETTER I68: ANNETTE LITTIER

Response to Comment I68-01

Please refer to **General Response 3.8.1** pertaining to consistency with local zoning codes. Please see **General Response 3.8.2** regarding the use of agricultural land. The Strawberry Fields Site is predominantly zoned as Limited Agriculture and not “prime agricultural” as suggested by the commenter.

Response to Comment I68-02

Please see **General Response 3.11** regarding issues related to flooding, the floodplain, setbacks from the Sacramento River, and water quality. See **General Response 3.10** regarding waste water and leach field location. As described in Section 2.3.2, one option for wastewater treatment is an on-site wastewater treatment plant. Effluent would be treated to meet disinfected tertiary recycled water standards under Title 22 of the California Code of Regulations. Effluent would be of high quality and would not have the potential to significantly degrade surface water or groundwater quality. The other option for wastewater treatment is connection to the City of Redding's sewer system for treatment at the City's wastewater treatment plant.

All stormwater runoff from the development area would be infiltrated on the site and would not discharge to the Sacramento River. As described in Final EIS Appendix N, the development would use catch basin filters, infiltration trenches and vegetated swales to filter stormwater and remove sediment and contaminants.

Response to Comment I68-03

Please see **General Response 3.15** regarding noise from traffic and the proposed amphitheater. As described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives.

Response to Comment I68-04

Please see **General Response 3.13** for more information regarding light, light pollution, glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements.

Response to Comment I68-05

Please refer to **General Response 3.14** and **Response to Comment A4-23** regarding traffic and access points. Roadway access points to the Strawberry Fields Site are discussed and analyzed in Draft and Final EIS Sections 2.2, 2.3 and 4.8, as well as the TIS (Draft EIS Appendix F) and Updated TIS (Final EIS Appendix Q).

Response to Comment I68-06

Please see **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City. Please see **Response to Comment A4-01** regarding the Civic Auditorium.

Response to Comment I68-07

Please see **General Response 3.6.3** regarding how the project alternatives will affect the incidence of human trafficking, prostitution and other undesirable outcomes. Please also refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I69: GARY BOSSUOT

Response to Comment I69-01

Please refer to **General Response 3.8.1** pertaining to consistency with local zoning codes and **General Response 3.8.2** regarding the use of agricultural land. Please also see **General Response 3.6.3** concerning local socioeconomic effects such as property values. There are no mitigation measures associated with property values for the development of Alternative A because the project would have a less-than-significant impact on property values.

Response to Comment I69-02

Please see **Response to Comment I63-04** regarding the anticipated mitigations along Bechelli Lane. Please see **Response to Comment A4-23** regarding the implementation of off-site mitigation improvements. As described in **Response to Comment A4-23**, all proposed mitigation improvements would be constructed in a manner consistent with the applicable agencies' approved standards and adopted plans. Refer to **Response to Comment A4-24** regarding an assessment of private property impacts along Bechelli Lane.

Please also see **Response to Comment A8-05** and **A8-11** regarding traffic flows at the South Bonnyview Road and Bechelli Lane intersection.

Response to Comment I69-03

Please refer to **General Response 3.13** regarding lighting and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements. Please see **General Response 3.15** regarding noise from traffic and the proposed amphitheater. As described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives.

Response to Comment I69-04

Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Regarding the commenter's statements about the methods and options of conducting tribal gaming and land-in-trust, please see Section 1.0 of the Draft EIS and Final EIS, which describe BIA authority and procedures for the Proposed Action.

Response to Comment I69-05

The commenter provides no evidence that the Tribe's existing Win-River Casino is a magnet to criminal behavior. Please see **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services. As described therein, the level of criminal incidents that occur at casinos and other gaming venues are similar to those of other commercial venues.

Response to Comment I69-06

Please refer to **General Response 3.7.2** pertaining to project utilities such as water supply and wastewater services. One of the primary purposes of an EIS prepared pursuant to NEPA is to evaluate environmental impacts. Although it would be helpful for such an analysis, it is not necessary for an MOU to exist in order to assess environmental impacts.

Response to Comment I69-07

Please refer to **General Response 3.8.1** pertaining to consistency with local zoning codes. Please see **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City. Please refer to **General Response 3.6.4** regarding taxes and fiscal effects. Please refer to **General Response 3.12.2** regarding potential effects to habitat. Please see **General Response 3.17** regarding enforcement of mitigation and best management practices (BMPs). Please see **General Response 3.1.2** regarding the thoroughness and completeness of the Draft EIS.

COMMENT LETTER I70: GLEN HARMER

Response to Comment I70-01

Please refer to **General Response 3.13** regarding lighting and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements. Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please refer to **General Response 3.12.2** regarding potential effects to habitat. Please see **General Response 3.14** concerning traffic. Please refer to **General Response 3.9** regarding impacts to water supply. Please see **General Response 3.10** regarding wastewater and leach field location. Please see Draft and Final EIS Section 2.0 and **General Response 3.5.4** regarding the range of alternatives analyzed in the EIS, including the option of expanding the existing Win-River Casino (i.e., Alternative F). Please see **General Response 3.6.4** regarding fiscal impacts to local governments.

COMMENT LETTER I71: MARK COULTER

Response to Comment I71-01

Comment noted. Please see **General Response 3.15** regarding noise from traffic and the proposed amphitheater. As described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives. Please also refer to **Response to Comments I71-02** through **I71-06** below.

Response to Comment I71-02

Comment Noted. Impacts regarding traffic and associated noise and air quality impacts are addressed throughout the EIS.

Response to Comment I71-03

Please see **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services.

Response to Comment I71-04

Please see **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, homelessness, crime and the provision of law enforcement services.

Response to Comment I71-05

Please see **General Response 3.6.3** and Final EIS **Appendix L** regarding potential effects on property and housing values. As described therein and in Draft and Final EIS Section 4.7, the project alternatives are anticipated to have a less-than-significant effect on property and housing values.

Response to Comment I71-06

Please see **General Response 3.15** regarding noise from traffic and the proposed amphitheater. As described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives. Please see **General Response 3.16** regarding air quality and climate change. Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, and signage elements.

Response to Comment I71-07

As discussed in section 2.3 of the Draft EIS, the project includes closure of the existing Win-River Casino. Thus, only one casino would be open. As stated in the Draft EIS Section 1.0, this EIS has been prepared pursuant to the NEPA, a federal law, to assess the environmental impacts of proposed federal actions intended to improve the long-term economic vitality and self-governance of the Tribe by taking the approximately 232-acre Strawberry Fields Site into federal trust status for the Tribe for gaming purposes.

Please refer to **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need.

The Tribe does not have shareholders. Rather, it is a governmental entity.

Please refer to **General Response 3.6.4** regarding taxes and fiscal effects.

Regarding the commenter's statement regarding increased income, it is true that the Proposed Project would provide socioeconomic benefits to the Tribe and its members and families. It is also true that the Proposed Project would provide benefits to local residents in the form of new jobs and increased economic activity. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I72: MARYLIN MEISSNER

Response to Comment I72-01

Please see **General Response 3.2.1** regarding expressions of opinion and non-substantive comments. Please refer to **General Response 3.12.2** regarding potential effects to habitats. Please also see **General Response 3.5** regarding the range of alternatives analyzed in the Draft EIS.

COMMENT LETTER I73: NOAH MEGILL

Response to Comment I73-01

Please see **General Response 3.2.1** regarding expressions of opinion and non-substantive comments. Please refer to **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please see **General Response 3.13.1** regarding project viewpoints. Please refer to **General Response 3.6.2** regarding substitution effects to local businesses. Please refer to **General Responses 3.12.1** and **3.12.2** concerning impacts to special-status species and habitats. Socioeconomic effects of the Proposed Project are not anticipated to benefit the Tribe at the expense of other local residents. Rather, socioeconomic effects are anticipated to be either positive or less-than-significant to the vast majority of local residents. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I74: PAM HARMER

Response to Comment I74-01

Regarding the commenter's statement of costs and benefits, it should be noted that the EIS does not conclude that the project's environmental impacts outweigh the benefits. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Please see **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services. As described therein, the level of criminal incidents that occur at casinos and other gaming venues are similar to those of other commercial venues. Please see **General Response 3.14** regarding traffic. Please see **General Response 3.15** regarding noise from traffic and the proposed amphitheater. As described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives. Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements. Please see **General Response 3.6.3** regarding potential effects on property and housing values. As described therein and in Draft and Final EIS Section 4.7, the project alternatives are anticipated to have a less-than-significant effect on property and housing values.

Please also see **General Response 3.8.1** pertaining to consistency with local zoning codes. Please refer to **General Responses 3.12.1** and **3.12.2** concerning impacts to special-status species and habitats. Please refer to **General Response 3.11** regarding issues related to flooding and floodplains. Please see **General Response 3.6.2** regarding the anticipated effects to local businesses. Please see **General Response 3.6.4** regarding taxes and fiscal effects.

Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please see Draft and Final EIS Section 2.0 and **General Response 3.5.4** regarding the range of alternatives analyzed in the EIS, including the option of expanding the existing Win-River Casino (i.e., Alternative F).

COMMENT LETTER I75: ROD DOLE, HARRISONS MARINE AND RV

Response to Comment I75-01

Please see **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City. Note that the sale of boats would likely comprise a relatively small portion of the sporting goods element of the project alternatives.

COMMENT LETTER I76: WALTER COLE

Response to Comment I76-01

Please refer to **General Response 3.14** regarding traffic. Traffic impacts from the Interstate-5 / South Bonnyview Interchange were analyzed extensively in the TIS, Updated TIS and Draft and Final EIS Section 4.8.

COMMENT LETTER I77: BRUCE ARMSTRONG

Response to Comment I77-01

Please refer to **General Response 3.14** regarding traffic. Please see **General Response 3.1.2** regarding the thoroughness and completeness of the Draft EIS as it addresses environmental issues. Please refer to **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services. Please also see **General Response 3.6.4** regarding taxes and fiscal effects.

COMMENT LETTER I78: CADE WRIGHT

Response to Comment I78-01

Comment noted; commenter expresses support for the Proposed Project. Please also see **General Response 3.6.4** regarding taxes and fiscal effects.

COMMENT LETTER I79: HANNAH LITTIER

Response to Comment I79-01

Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements.

Response to Comment I79-02

Please see **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City. **Response to Comment A6-10** regarding the Carr Fire and its potential effects on housing. It should be noted that the that the Proposed Project would provide benefits to local residents in the form of new jobs and increased economic activity. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

Response to Comment I79-03

Please refer to **General Response 3.14** regarding traffic. Please see **General Response 3.16** regarding air quality and climate change. Please refer to **General Response 3.13.3** concerning light pollution. Please also refer to **General Responses 3.12.1** and **3.12.2** concerning impacts to special-status species and habitats.

COMMENT LETTER I80: JODY CLARK

Response to Comment I80-01

See **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please see Draft and Final EIS Section 2.0 and **General Response 3.5.4** regarding the range of alternatives analyzed in the EIS, including the option of expanding the existing Win-River Casino (i.e., Alternative F). Please see **General Response 3.15** regarding noise. Please see **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services. Please also see **General Response 3.6.4** regarding taxes and fiscal effects, including funding for law enforcement, fire and emergency medical services. It should be noted that the that the Proposed Project would provide benefits to local residents in the form of new jobs and increased economic activity. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I81: JOHN DONOGHUE

Response to Comment I81-01

Please refer to **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, homelessness, prostitution, crime and the provision of law enforcement services. It should be noted that the that the Proposed Project would provide benefits to local residents in the form of new jobs and increased economic activity. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I82: MARY O'GRADY

Response to Comment I82-01

Commenter expresses support for the Proposed Project. Please see **General Response 3.5.4** regarding the alternative locations analyzed in the Draft EIS.

COMMENT LETTER I83: PAUL & CONNI KERR

Response to Comment I83-01

Please refer to **General Response 3.8.2** regarding the use of agricultural land. See **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please see Draft and Final EIS Section 2.0 and **General Responses 3.5.2** and **3.5.4** regarding the range of alternatives analyzed in the EIS, including issues associated with many alternative sites and locations.

COMMENT LETTER I84: TIM BROWN

Response to Comment I84-01

Comment noted; commenter expresses support for the Proposed Project. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Please also see **General Response 3.2.1** regarding expressions of opinion.

COMMENT LETTER I85: DAVID & DONNA WILLIAMSON

Response to Comment I85-01

Please refer to **General Response 3.13.1** regarding aesthetics and project viewpoints. Please refer to **General Responses 3.12.1** and **3.12.2** concerning impacts to special-status species and habitats. Please refer to **General Response 3.14** concerning traffic. Please see Draft and Final EIS Section 2.0 and **General Responses 3.5.2** and **3.5.4** regarding the range of alternatives analyzed in the EIS, including the option of expanding the existing Win-River Casino (i.e., Alternative F). Please refer to **General Response 3.1.2** regarding the thoroughness and completeness of the Draft EIS. It should be noted that the NEPA EIS process was initiated during 2016.

COMMENT LETTER I86: DOUG WENHAM

Response to Comment I86-01

See **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please also see **General Response 3.6.4** regarding taxes and fiscal effects, including funding for local governmental services. It should be noted that the that the Proposed Project would provide benefits to local residents in the form of new jobs and increased economic activity. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. As described in Draft and Final EIS Section 2.3.2, the Proposed Project would be constructed to meet International Building Code (IBC) requirements. Please refer to **General Response 3.8.1** pertaining to consistency with local zoning codes.

COMMENT LETTER I87: TAMMY COLE

Response to Comment I87-01

Commenter's statement regarding spotlights at the existing Win-River Casino are acknowledged. The BIA does not know the details regarding the occurrence described by the commenter, or if it took place. Please see **General Response 3.4** concerning project design and architectural style. Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints and signage elements. Please refer to **General Response 3.8.2** relating to us of agricultural land. Please note that, as described in Draft and Final EIS Section 2.0, most of the Strawberry Fields site will remain undeveloped. Project improvements would comprise less than half of the site. Please see **General Response 3.15** regarding noise. Please see **General Response 3.6.3** regarding potential effects to property values. Please refer to **General Responses 3.12.1** and **3.12.2** concerning impacts to special-status species and habitats. Please see **General Response 3.14** regarding traffic. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed.

COMMENT LETTER I88: CANDIE SULLIVAN

Response to Comment I88-01

Please refer to **General Responses 3.12.1** and **3.12.2** concerning impacts to special-status species and habitats. Please refer to **General Response 3.14** relating to traffic. Please see **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, property values, crime and the provision of law enforcement services. Please see **General Response 3.8.2** concerning the use of agricultural land. Please see **General Response 3.4** pertaining to project design and architectural style. Please also refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, and signage elements.

COMMENT LETTER I89: DAVID LEDGER

Response to Comment I89-01

Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, and signage elements.

Response to Comment I89-02

Please see **General Response 3.11** regarding Sacramento River Streambank Stabilization.

Response to Comment I89-03

Please see **General Response 3.12.1** and **3.12.2** regarding potential effects to special-status species and habitat, including bank swallows and certain fish species.

Response to Comment I89-04

Comment noted. A VELB-focused survey was conducted on May 21, 2019 in accordance with *Conservation Guidelines for the Valley Elderberry Longhorn Beetle* (USFWS, 1999), and the results will be incorporated into the Final EIS. The 2019 survey identified an additional three elderberry shrubs outside of the development footprint along the Sacramento River and within close proximity (<20 ft.) to the location of the singular elderberry shrub identified in the 2016–2017 surveys. Diameters of stems at ground level were 1–3 in. with the exception of four being >3 in. but <5 in. No indicators or boreholes for VELB were observed in these three elderberry shrubs. See revised Biological Assessment for the USFWS (Final EIS Appendix O-3).

COMMENT LETTER I90: JAMES M. LYNCH, K&L GATES LLP

Response to Comment I90-01

Comment noted. Please see **General Response 3.2.1** regarding expressions of opinion. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. Please see **General Response 3.1.3** regarding how the EIS analyses constitute a "hard look" required by NEPA. Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please see Draft and Final EIS Section 2.0 and **General Responses 3.5.2** and **3.5.4** regarding the range of alternatives analyzed in the EIS, including the option of expanding the existing Win-River Casino (i.e., Alternative F). Also see **Response to Comments I90-02** through **I90-40** below for more information.

Response to Comment I90-02

The procedural requirements of 25 CFR Part 151 are beyond the scope of this EIS. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. Please see Draft EIS Sections 1.1, 1.2 and 1.3 for a discussion of the Proposed Action, the purpose and need and background, respectively. Please see **General Response 3.3** regarding the adequacy of the purpose and need statement and why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need.

Response to Comment I90-03

The purpose and need statement included in Final EIS Section 1.2 includes a reference to the "trust land regulations at 25 CFR Part 151" and therefore generally includes the subsections reference by the commenter. The evaluation criteria and procedural requirements of 25 CFR Part 151 must be satisfied prior to land being taken into trust; however, this is separate from the NEPA process and therefore the consideration of these criteria are beyond the scope of this EIS. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS.

Response to Comment I90-04

Alternatives and potential alternatives were indeed extensively analyzed in the Draft EIS. Please see Draft and Final EIS Section 2.0 and **General Responses 3.5.2** and **3.5.4** regarding the range of

alternatives analyzed in the Draft EIS. These analyses were also not included in the purpose and need discussion (Draft EIS Section 1.2) because to do so would be unnecessarily duplicative. Please see **General Response 3.1.3** regarding how the EIS analyses constitute a "hard look" required by NEPA and why the preparation of a supplemental EIS is unwarranted.

Response to Comment I90-05

The Draft EIS includes an appropriate and reasonable detailed description of project components to facilitate the analysis of potential environmental impacts. Also, Draft EIS figures do indeed label project components. There is an inherent trade-off between the level of labelling detail. Too many labels can obscure the image and interpretation of the project features. Too few labels can make it difficult to understand the project components. Due to specific comments received on the Draft EIS, including this comment, additional labels have been included in the project figures, including Figure 2-8.1, to depict physical components to a greater level of detail. It should also be noted that the Draft EIS and Final EIS include additional figures in Sections 3.0 and 4.0 as well as in the appendices. These figures typically include additional levels of detail regarding the attributes that relate to the specific area of study for each EIS section and appendix. For example, the Wastewater Management & Drinking Water Feasibility Study (i.e., Draft EIS Appendix B) includes descriptions and figures of water infrastructure that is more detailed than that included in Draft EIS Section 2.0.

The commenter is also correct that the architectural renderings included in the Draft EIS (e.g., Figure 2-9) do not include labels. It is atypical for architectural renderings to include labels, although renderings for some projects do include labels. Labels are intentionally omitted from the EIS architectural renderings because labels would clutter the renderings and thus potentially interfere with a person's perception of how each project would appear in the real world if actually constructed. In addition, if a reader has questions about the project components that are illustrated in the EIS architectural renderings (e.g., Figure 2-9), she or he can simply refer to the site plans in the EIS (e.g., Figure 2-8.1) which are labelled.

Regarding the project components, note that some of the Draft EIS figures have been updated in the Final EIS to include additional detail. This includes Figure 2-8.1, which depicts Alternative A. Also note that, as described in **Response to Comment A4-01**, the amphitheater is no longer part of any of the project alternatives.

Please also see **General Response 3.4** regarding project design and **General Response 3.13** regarding the aesthetics of the project alternatives. In addition, the text of EIS Section 2.3.2 has been updated in the Final EIS to include additional information regarding the project components and aesthetics, such as the heights of the buildings and location of proposed electronic signs. The five tall elements depicted on the architectural renderings for Alternatives A, B, and C (Draft EIS Figures 2-9, 2-11 and 2-13) are design elements on the proposed parking garage intended to provide visual interest; these elements are not proposed to be electronic signs. Additionally, the architectural renderings depict the parking garage façade as being decorated with a landscape mural, which may have been mistaken by the commenter as the actual landscape of the project site.

Response to Comment I90-06

As described above, Final EIS Section 2.3.2 has been updated to include the proposed structure heights, as well as additional details regarding the visible project improvements, including signage. The two towers referenced in this comment as being depicted on either side of the parking lot are actually abutments to the proposed parking garage, which would be 5 stories high.

The architectural style described in Section 2.0 of the Final EIS refers to the designed elements of the project alternatives. Please also see **General Response 3.4** concerning project design and architectural style. Regarding signage, please refer to **General Response 3.13**.

The proposed landscape design, planting materials and selections for screening, or maturation time have not yet been established, as that is typically a construction-level detailed plan that is developed once a project has been approved. But the landscaping plan would be designed to complement the regionally-inspired design aesthetic, as well as create a harmonious and contemporary resort design for the property with the surrounding natural beauty at the edge of the Sacramento River.

Response to Comment I90-07

Please see **General Response 3.11** regarding proposed development within the 100-year floodplain and the potential for flooding from Churn Creek. As discussed therein, although previous hydraulic modeling of Churn Creek in the 100-year Churn Creek flood event identified a potential for Churn Creek to overtop I-5 and cause shallow overflow across the Strawberry Fields Site (see Draft EIS Section 2.3.2), Caltrans has no record of I-5 overtopping in this area in the 50 years of I-5's existence. As described in Section 4.1 of Appendix N, this lack of observed overtopping of I-5 during known extreme flooding of Churn Creek is likely due to the elevation of the agricultural field and Smith Road compared to I-5. It is more likely that the bulk of the estimated 700 cfs spill-over actually flows south to Smith Road and beyond – well away from the Strawberry Fields Site. Regardless of the lack of actual occurrences of this phenomenon, the proposed vegetated swale that would run along the easterly project boundary has been conservatively designed to provide emergency conveyance of possible storm water overflow from Churn Creek east of I-5.

The Grading and Drainage Report was developed to inform the design of the project alternatives and has been incorporated into the EIS. The Grading and Drainage Report describes the proposed grading and drainage features of the project alternatives. The updated Grading and Drainage Report is provided as Final EIS Appendix N.

Response to Comment I90-08

The infiltration wet pond has been incorporated into revised EIS Figure 2-8.1. As this feature is described in the updated Grading and Drainage Report, wet ponds (a.k.a. stormwater ponds, retention ponds, wet extended detention ponds) are constructed basins that have a permanent pool of water throughout the year (or at least throughout the wet season) and differ from constructed wetlands primarily in having a greater average depth.

Response to Comment I90-09

The Grading and Drainage Report was developed to inform the design of the project alternatives and has been incorporated into the EIS. The Grading and Drainage Report describes the proposed grading and drainage features of the project alternatives. The Report describes stormwater facilities necessary to manage stormwater flows and protect water quality. The updated Grading and Drainage Report is provided as Final EIS Appendix N. The EIS as a whole provides a detailed description and evaluation of environmental effects of the Proposed Action in compliance with NEPA.

Response to Comment I90-10

Please see **General Response 3.11** regarding Sacramento River Streambank Stabilization. As described in EIS Section 2.3.2, bank stabilization would occur along the western site boundary, extending approximately 1,000 feet south of the northern project site boundary. As described in Section 6.2 of Final EIS Appendix N, all plantings would be done above the ordinary high-water mark and would not require work in the Sacramento River. Willows would be planted in the riverbank by hand. Native trees would be planted between 15 and 50 feet from the top of the bank. These native trees would be planted by hand and construction equipment such as a power auger, backhoe or small excavator.

Response to Comment I90-11

Proposed facilities discussed on page 2-20 of the Draft EIS are described in Table 2-1 in section 2.0 of the Draft Environmental Impact Statement. Each alternative including new facilities, square footage of each area, locations, access improvements, figures, water supply, architecture, signing, lighting, landscaping, security, law enforcement, grading and drainage, energy, and construction are included in this table.

Response to Comment I90-12

Please see **General Responses 3.5.2** and **3.5.4** regarding the range of alternatives analyzed in the Draft EIS.

Response to Comment I90-13

See **General Response 3.3** regarding why Alternative A best satisfies the purpose and need. Please see **Response to Comment A6-09** regarding fiscal effects. Contrary to the commenter's statements, the Draft EIS does indeed address the areas of environmental concern described by the commenter. However, these analyses are to be found in Draft EIS Section 4.0, not in the description of the purpose and need (Draft EIS Section 1.0) or in the description of project alternatives (Draft EIS Section 2.0). Including a comprehensive analysis of potential impacts in Draft EIS Sections 1.0 and 2.0 would be unnecessarily duplicative.

Response to Comment I90-14

Please see **Response to Comment A4-23** and **A8-11** regarding site access. The TIS (Draft EIS Appendix F) and Updated TIS specifically incorporated the City's planned diverging diamond interchange with roundabouts, and comprehensively evaluated Bechelli Lane's operations and ability to accommodate the projected peak traffic demands associated with the Proposed Project. As per the *River Crossing*

Marketplace Specific Plan EIR, "Under the Year 2040 with Rancheria plus Project scenario…cumulative impacts at intersection #5 [South Bonnyview Road/Bechelli Lane] would be mitigated with implementation of Mitigation Measure TRANS-1.1 [Reconstruct the intersection and approaches into a four-leg, two-lane roundabout in accordance with the specifications of the City Engineer]." The City provided improvement plans for the construction of South Bonnyview Road improvements at Bechelli Lane and the I-5 interchange ramps, the combination of which are understood to be representative of the aforementioned "TRANS-1.1." These improvements have been fully constructed and the facilities were opened to traffic in November 2022. Accordingly, the project has no mitigation responsibility at this intersection and the Updated TIS reflects these changes. Please see **Response to Comment A4-02** for further information.

Emergency access to the project site would be ensured through the incorporation of development standards as specified by local agencies, including Shasta County and the City, as applicable. Emergency services are included in the review and conditioning of all construction projects. Such a review and assessment would ensure conditions that facilitate adequate emergency access. As described in **Response to Comment A4-23**, all proposed mitigation improvements would be constructed in a manner consistent with the applicable agencies' approved standards and adopted plans. The commenter seems to suggest that the project site will have pronounced peak traffic periods, in particular patrons "will leave at the same time" and be counter flow to entering emergency vehicles. However, the daily patron profile of tribal gaming facilities depicts more uniform and even peak travel periods. Also, in the event of an emergency evacuation, the public roadway (Bechelli Lane) would be under the control of Shasta County and the City.

Response to Comment I90-15

Please see **Response to Comment A4-02** regarding the methodology employed in the TIS and Updated TIS**.**

Response to Comment I90-16

The TIS and Updated TIS evaluate the appropriate facilities and absolutely estimate traffic Impacts from the Proposed Project. Estimation of impacts is one of the primary purposes of the TIS and Updated TIS. Please see **Response to Comment A4-2** regarding the methodology employed in the TIS and Updated TIS and **Response to Comment A4-21** regarding intersection and freeway off-ramp queuing**.** Please also see **Response to Comment T6-101.11** regarding additional intersections that were analyzed in the Updated TIS.

Response to Comment I90-17

Please **Response to Comments A4-02** and **A6-05** regarding the methodology employed in the TIS and Updated TIS, including the methods used to estimate trips for the Event Center and Conference Center**.** Please see **Response to Comments I90-14** through **I90-17** regarding Attachment B to Comment Letter I90 (i.e. translutions, inc. letter dated June 17, 2019).

Response to Comment I90-18

The Sacramento River Designated Floodway is shown in the Draft EIS Appendix B (Exhibit 2A). Alternative A is designed to lie outside of the FEMA 100-year floodplain; therefore, it is outside of the Floodway as well. All development, with the exception of the excavated wet pond would be constructed outside both the FEMA 100-year floodplain and the Sacramento River Designated Floodway.

The flood elevation and extent are well known and documented on this site based on close observation and surveying performed during the February 2017 flood event. There is no doubt that the proposed improvements are outside of the regulatory 100-year floodplain also known as Zone AE which corresponds with the regulatory floodway at this location.

As shown on Figures A3, B3, C3, and D3 of Draft EIS Appendix C, the grading scheme for all the alternatives will be to direct all runoff to the easterly parking areas and access roads where it will be collected and conveyed in the project's storm drain system. The on-site stormwater piping system will consist of perforated pipes and bottomless catch basins in gravel-filled trenches that would extend through the loam and into the underlying sandy gravel stratum to promote infiltration to the maximum practical extent. The storm drain system would implement numerous storm water quality Best Management Practices (BMPs) to improve water quality of the runoff, including but not limited to catch basin filters, infiltration trenches, vegetated swales, wet ponds, and potential use of pervious pavement/concrete.

Any stormwater that does not percolate in the thousands of linear feet of gravel-filled trenches would be conveyed to the vegetated swale on the eastern boundary of the project. The sandy-gravel bottom of this wide swale would be capable of infiltrating at least 182 cfs (the entire estimated 100-year runoff of the proposed development) over its entire area prior to reaching the edge of the regulatory floodplain at a point approximately 0.5 miles from the ordinary edge of the river. All the onsite drainage would pass through numerous water quality BMPs before being discharged into the vegetated swale, going well beyond current water quality standards in today's land development industry. The on-site infiltration system is designed to entirely infiltrate the on-site stormwater prior to reaching the edge of the floodplain, so there will be no contact between the on-site runoff and Sacramento River flood water. There is a one in one thousand-year probability of on-site 100-year stormwater runoff coinciding in time with flooding flow in the Sacramento River.

The infiltration and bio-swale along the east boundary is also designed to provide conveyance of 700 cfs storm water overflow from Churn Creek east of Interstate 5 to the Sacramento River. This overflow that is predicted by hydraulic modeling of Churn Creek in the 100-year Churn Creek flood event is a condition that exists independently of the proposed Strawberry Fields development. Caltrans has no record of floodwater overtopping at this location in the 50 years that I-5 has existed. If this occurs, it is not controllable by the project proponent, and the Churn Creek flood water will be going to the Sacramento River at this location or another whether the Strawberry Fields project is developed or not.

The wet pond shown on Alternatives A-D is designed to attenuate and treat the erosive capacity of the 700 cfs uncontrolled flow from Churn Creek by slowing, spreading, and infiltrating prior to flowing in a southwesterly direction to the river approximately 0.5 flow-miles downstream. The chance of this flow

coinciding with flood flow in the river is again about one in one thousand-years, and there would be no additional harm on flooding if it did so. It would be entirely excavated in the upland area (i.e. not in a recognized wetland feature) of the floodplain, so there will be no effect on the flood elevation of the Sacramento River.

With regards to potential flooding of the leach fields in the event of a storm larger than the 100-year flood, the project has been designed according to Shasta County's 2018 Local Agency Management Program (LAMP) for Onsite Wastewater Treatment Systems (OWTS). According to Shasta County's LAMP for OWTS, the required horizontal setback distance between a leach field and perennial stream is 100-feet "to be measured from the 10-year flood line or top of bank or other evident high water-line or the expected 10-year flood line." Given this Shasta County standard requiring a setback from the 10-year flood line, the proposed leach field design offers a large factor of safety in the event the Sacramento River floods, as the proposed leach field is located outside the 100-year flood line. It should also be noted that before effluent is disposed in the proposed leach field it would be treated to meet disinfected tertiary recycled water standards under Title 22 of the California Code of Regulations. Effluent would be of high quality and would not have the potential to significantly degrade surface water or groundwater quality.

As identified in Draft EIS Section 1.6, the USEPA would review the project to determine compliance under applicable provisions of the Clean Water Act, including the NPDES program.

Response to Comment I90-19

Please see **General Response 3.11** regarding Sacramento River Streambank Stabilization. Section 3 of the EIS includes a description of the Sacramento River and associated floodway and floodplain (Section 3.3), and associated habitat and wildlife species (Section 3.5). Section 4 of the EIS provides a comprehensive evaluation of potential impacts of streambank stabilization activities.

Response to Comment I90-20

The amphitheater is no longer part of the Proposed Project. Therefore, this comment is no longer applicable.

Response to Comment I90-21

The amphitheater is no longer part of the Proposed Project. Therefore, this comment is no longer applicable.

Response to Comment I90-22

A revised construction noise analysis was performed for the Proposed Project and can be seen in **Section 4.11-1**. As seen within the revised analysis for construction, while a significant impact would occur, the impact would be temporary in nature rather than a permanent feature. The BMPs identified are standard construction practices to reduce noise and would be implemented consistently throughout the construction phase of the Proposed Project. For the construction BMP that the commenter identified as conditional, the BMP states that if the preferred method of using hydraulically or electrically powered equipment cannot be implemented, then mufflers would be used on the compressed air exhaust of the equipment that is

used, which would similarly reduce the potential for noise impacts to occur. Therefore, this BMP would be consistently used to reduce construction noise and not be conditional. For the second BMP under operation that was identified as conditional, the positioning of the HVACs away from sensitive receptors whenever possible, this would be done when feasible to help reduce noise, but as described in **Section 4.11-1**, HVAC systems were identified to have a less than significant impact without mitigation. Therefore, this BMP would merely reduce this less-than-significant impacts further and is not required to reduce a significant impact. Since the BMPs are sufficient to reduce potential noise impacts identified in **Section 4.11**, no additional edits are required.

Response to Comment I90-23

Please see **General Response 3.6.1** regarding substitution effects to competing gaming businesses.

Response to Comment I90-24

Please see **General Response 3.6.1** for evidence that supports the diminishing of substitution effects over time.

Response to Comment I90-25

The commenter is correct that there is a link between problem gambling and other undesirable outcomes. Please see **General Response 3.6.3** regarding negative social outcomes such as substance abuse, mental health, prostitution and human trafficking.

Response to Comment I90-26

Please see **General Response 3.6.3** and Final EIS **Appendix L** regarding local socioeconomic effects, including crime, problem gambling and addiction.

Response to Comment I90-27

Please see **General Response 3.6.3** regarding how the County defined calls for service (CFS) and how this effects the crime and fiscal analyses included in the EIS.

Response to Comment I90-28

The commenter is correct that cooperating agencies can be federal, state or tribal entities. The commenter is also correct that cooperating agencies should be identified early on the scoping process, as was the case here (see Draft EIS Section 6.2 and **Response to Comment T6-30**). Off-site improvements occurring off of trust land may be subject to discretionary approvals from the City, County, and/or other location agency that could be subject to CEQA. Anticipated approvals from state and local agencies are listed in the Final EIS, Volume II, Section 1.6. Much of the design of these improvements has not yet occurred, so it would be speculative to state whether analyses in the EIS are CEQA compliant. However, efforts were made in the EIS to analyze and address the environmental effects of off-site improvements (refer to the Final EIS, Volume II, Section 4.14). Thus, much and possibly most of the analysis of offsite

improvements in the EIS is likely to be sufficient to support CEQA compliance, although this will ultimately be at the discretion of approving agencies to determine, and cannot be confirmed until the details of such improvements and associated approvals are more fully developed. It should be noted that the Tribe and State of California entered in a new Tribal-State Compact in 2023; the new Compact does not contain any references to CEQA and does not that require that the Tribe conduct environmental analysis or implement environmental mitigation. It does however require that the Tribe establish an Impact Mitigation Fund for the for purposes of providing assistance to non-tribal law enforcement, emergency services, and service agencies with demonstrated impacts from the Gaming Facilities (see discussion of the new Tribal State Compact in the Final EIS, Volume II, Section 1.5.1).

Response to Comment I90-29

Please see **Response to Comment I90-28** regarding applicability of CEQA. The specific commenter statement that the BIA "ignored Caltrans' assumption that "there will be a corresponding or joint California Environmental Quality Act (CEQA) document that will address the CEQA required mitigation and requirements…."" is inaccurate. The BIA has not "ignored" CalTrans. CalTrans is entitled to make comments, which BIA has considered (and will continue to consider). Every cooperating agency statement does not engender a formal response. The commenter is also incorrect regarding the need for the County and Tribe enter into a binding legal agreement prior to assessing environmental impacts. See **Response to Comment A6-01** where this subject is addressed.

Please see **Response to Comments A4-04** and **A4-05** that acknowledge that the delivery of water and electricity is at the discretion of certain local agencies, including the City. The commenter's accusations that the BIA rebuffed the assistance of cooperating agencies are inaccurate and unsubstantiated.

Response to Comment I90-30

Please see **Response to Comments I90-01** through **I90-27** regarding NEPA compliance. See **Response to Comments I90-28** and **I90-29** regarding the issue of CEQA compliance. See **Response to Comments I90-18** and **I90-19** regarding water and wastewater. Please see **Response to Comment A6-01** regarding whether it is necessary for the County and Tribe enter into a binding legal agreement prior to assessing environmental impacts.

Response to Comment I90-31

See **Response to Comments I90-28** and **I90-29** regarding the issue of CEQA compliance. Please see **General Response 3.1.3** regarding how the EIS analyses constitute a "hard look" required by NEPA. The EIS analyses the fee-to-trust action as well as the development of the alternatives that would result from the action through out Final EIS Section 4.0, including the indirect impacts from implementation of recommended mitigation in Final EIS Section 4.14.

Response to Comment I90-32

Please see **General Response 3.1.3** regarding why the preparation of a supplemental EIS is unwarranted.

Response to Comment I90-33

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0. See **General Response 3.2.2** regarding why the BIA has the statutory authority to take lands into trust in this circumstance.

Response to Comment I90-34

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0. See **General Response 3.2.2**.

Response to Comment I90-35

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0. See **General Response 3.2.2** regarding why the BIA has the statutory authority to take lands into trust in this circumstance.

Response to Comment I90-36

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0. See **General Response 3.2.2** regarding why the BIA has the statutory authority to take lands into trust in this circumstance.

Response to Comment I90-37

Comment noted.

Response to Comment I90-38

Regarding per capita distributions, please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. Calculations of estimated per capita payments were not included as part of the scope of the socioeconomic studies prepared in connection with the Draft EIS and Final EIS (EIS Appendices A and L). The commenter may be correct that Tribal families receive per capita payments that exceed the Shasta County average. Please also refer to **Response to Comments I90-1** through **I90-4** regarding the purpose and need.

Response to Comment I90-39

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope

of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0. See **General Response 3.2.2** regarding why the BIA has the statutory authority to take lands into trust in this circumstance.

Response to Comment I90-40

Issues regarding IGRA and statutory authority related thereto are beyond the scope of NEPA. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. However, the subject of IGRA is addressed in Draft EIS Section 1.0. See **General Response 3.2.2** regarding why the BIA has the statutory authority to take lands into trust in this circumstance.

COMMENT LETTER I91: JOHN DUNLAP, CONSULTING ENGINEER

Response to Comment I91-01

As described in Section 2.3.2, one option for wastewater treatment is an on-site wastewater treatment plant. Disposal would occur through landscape irrigation and percolation in leach fields. Before effluent is disposed in the proposed leach field it would be treated to meet disinfected tertiary recycled water standards as defined under Title 22 of the California Code of Regulations. Accordingly, additional filtration in the leach fields would not be needed as the effluent entering the leach fields would be of high quality and would not have the potential to significantly degrade surface water or groundwater quality. The leach fields would be located outside of the 100-year floodplain.

The Wastewater Management and Drinking Water Feasibility Study included as Appendix B of the Draft EIS included a seasonal storage pond. This pond was associated with the potential use of sprayfields. However, as described in Section 2.10.6 of the Draft EIS, the use of sprayfields was eliminated as an option, and a seasonal storage pond is not proposed. The updated Wastewater Management and Drinking Water Feasibility Study is included as Final EIS Appendix M.

Response to Comment I91-02

As described in Section 2.3.2, one option for wastewater treatment is an on-site wastewater treatment plant. Section 4.3, 4.10 of the EIS addresses the potential environmental effects of water supply and wastewater treatment and disposal. Effluent would be treated to meet disinfected tertiary recycled water standards under Title 22 of the California Code of Regulations. Disinfected tertiary recycled water is approved for the irrigation of food crops, parks and playgrounds, and residential landscaping by the State of California, as well as for any other irrigation use not specified or prohibited in the CCR. The reclaimed water produced by the proposed immersed membrane bioreactor (MBR) treatment system would be of high quality and would not have the potential to significantly degrade surface water or groundwater quality. Further, the treated effluent would be disposed of through a leach field and the quality of the recycled water applied at the surface would further improve by the time it percolates to the underlying aquifer due to the filtering effect of soils.

Response to Comment I91-03

As described in Draft EIS Section 2.3.2, on-site leach fields would be used to dispose of excess treated wastewater effluent by distributing it underground through a network of perforated pipes or infiltration chambers; therefore an underground disposal injection system is not proposed. As noted, before effluent is disposed in the leach fields it would be treated to meet disinfected tertiary recycled water standards as defined under Title 22 of the California Code of Regulations. Effluent would be of high quality and would not have the potential to significantly degrade surface water or groundwater quality. The disposal of reclaimed water within the leach fields would be regulated by the USEPA within the Underground Injection Control (UIC) program. Monitoring and reporting requirements of the UIC program ensure that the USEPA has the ability to protect water quality. Please see **General Response 3.10** regarding potential impacts to wastewater management and implementation of the proposed leach field under Wastewater Option 2 at the Strawberry Fields Site (i.e., Alternatives A through D).

COMMENT LETTER I92: MELINDA BROWN

Response to Comment I92-01

Please refer to **General Response 3.14** regarding traffic. Roadway access points to the Strawberry Fields Site are discussed and analyzed in Draft and Final EIS Sections 2.2, 2.3 and 4.8, as well as the TIS (Draft EIS Appendix F) and Updated TIS (Final EIS, Appendix Q).

Response to Comment I92-02

Please see **Response to Comment I90-14** regarding emergency access.

Response to Comment I92-03

Please see **Response to Comment A4-02** regarding the methodology employed in the TIS and Updated TIS.

Response to Comment I92-04

The commenter's statement regarding existing traffic conditions is acknowledged. Please refer to **General Response 3.14** regarding traffic.

Response to Comment I92-05

See **General Response 3.3** regarding why Alternative A best satisfies the purpose and need. Please see **General Response 3.5.3** regarding alternatives and financial feasibility. Please see **General Response 3.17** regarding the subject of mitigation and best management practices (BMPs). Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I93: RANDY CARTER, SPEAK UP SHASTA ASSOCIATION

Response to Comment I93-01

The commenter's stated opinion regarding the level of opposition to the Proposed Project is noted. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments. Please refer to **General Response 3.1.1** regarding the Draft EIS comment period.

Response to Comment I93-02

Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, and signage elements. Please refer to **General Response 3.8.2** pertaining to use of agricultural land and **General Response 3.12.2** regarding wildlife habitats. Please see **General Response 3.11** regarding streambank stabilization.

Please see **General Response 3.12.1** and **3.12.2** regarding potential effects to special-status species and habitat, including bank swallows and certain fish species.

Response to Comment I93-03

Comment noted. Please see **General Response 3.11.1, 3.12.1,** and **3.12.2** regarding the impacts to the Sacramento River and listed fish species. See also see **General Response 3.12.2** regarding potential impacts to bank swallows.

Development of the Proposed Project, including streambank stabilization and other construction activities, was evaluated for potential impacts to listed fish species and Critical Habitat in consultation with the National Marine Fisheries Service (NMFS; Final EIS Appendix O-3). NMFS reviewed the project under ESA Section 7(a)(2) and MSMA in a concurrence letter (May 7, 2019) and determined the proposed actions were not likely to affect listed fish species with the inclusion of mitigation measures listed in Final EIS Appendix O-3.

Response to Comment I93-04

Comment noted. Please see **General Response 3.12.1,** and **3.12.2** regarding the impacts to listed wildlife species and habitats. Please see Mitigation Measure **5.5.3** Wetlands and Waters of the U.S. concerning impacts to ponds and wetlands from wastewater disposal.

Response to Comment I93-05

Please see **General Response 3.9** regarding water supply. Each water supply option and wastewater treatment and disposal option has been analyzed within the EIS for each alternative. Sections 4.3, 4.10, and 4.14 of the EIS address the potential environmental effects of water supply and wastewater treatment and disposal.

Response to Comment I93-06

Please see **Response to Comment A4-02** regarding the methodology employed in the TIS (Draft EIS Appendix F) and the Updated TIS. Please see **Response to Comment T6-66** regarding why the TIS and Updated TIS did not use the VMT methodology suggested by the commenter.

Response to Comment I93-07

Section 4.14 of the Draft EIS describes the indirect environmental effects from implementation of off-site traffic mitigation measures for Alternatives A through F. Please see **Response to Comment T6-66** regarding why the TIS and Updated TIS did not use the VMT methodology suggested by the commenter. Please see **General Response 3.16** regarding climate change.

Response to Comment I93-08

Noise, vibration, and light are analyzed extensively in the Draft EIS. Please see **General Response 3.15** regarding noise and vibration. Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, light, and signage elements.

Response to Comment I93-09

Please see **General Response 3.11** regarding flooding hazards. As described in Section 4.3.1 of the EIS, development of Alternatives A – E would not reduce floodplain capacity of the respective project sites and therefore would not increase flooding off site.

Response to Comment I93-10

Potential impacts to cultural resources were analyzed extensively in Draft EIS Section 4.6. Please also see Responses to Comments **T4-01**, **T4-02**, **T4-03**, **T6-62** and **T6-63** regarding cultural resources.

Response to Comment I93-11

Potential socioeconomic impacts were analyzed extensively in Draft EIS Section 4.7. Please refer to **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City. Also refer to **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services. Please see **Responses to Comments T6-64** and **T6-65** regarding the use of census data to estimate the existing socioeconomic environment in the vicinity of the project sites.

Response to Comment I93-12

Please refer to **General Response 3.7.2** pertaining to utilities. Please see **Response to Comments A4-04** and **A4-05** that acknowledge that the delivery of water and electricity is at the discretion of certain local agencies, including the City. Please see **General Response 3.7.1** regarding the provision of other public services including law enforcement, fire, and EMS.

Response to Comment I93-13

Comment noted. Please refer to **Response to Comments I93-01** through **I93-12** above. Please see **General Response 3.1.3** regarding why the preparation of a supplemental EIS is unwarranted.

COMMENT LETTER I94: RED EMMERSON

Response to Comment I94-01

Comment noted. The letter attached by the commenter was submitted as Comment Letter I94.

Response to Comment I94-02

Comment noted. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

Response to Comment I94-03

Please refer to **General Response 3.8.2** regarding the use of agricultural land. Please refer to **General Responses 3.14** regarding traffic. Please see **General Response 3.15** regarding noise. Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, light and signage elements. Please refer to **General Response 3.6.2** regarding the anticipated effects to local businesses, and effects to local property values. Please refer to **General Response 3.6.4** regarding taxes and fiscal effects.

The commenter's statement that the Proposed Project would produce no benefits is not correct. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need.

Response to Comment I94-04

Please see **General Response 3.11** regarding issues related to flooding, the floodplain, setbacks from the Sacramento River, and water quality. See **General Response 3.10** regarding wastewater and leach field location.

As described in Section 2.3.2, one option for wastewater treatment is an on-site wastewater treatment plant. Disposal would occur through landscape irrigation and percolation in leach fields. Before effluent is disposed in the proposed leach field it would be treated to meet disinfected tertiary recycled water standards as defined under Title 22 of the California Code of Regulations. Effluent would be of high quality and would not have the potential to significantly degrade surface water or groundwater quality.

Response to Comment I94-05

Neither the TIS (Draft EIS Appendix F) nor the Updated TIS state that estimated traffic flows operate at acceptable levels. To the contrary, both the TIS and Updated TIS identify traffic facilities that are

anticipated to operate at unacceptable levels and propose mitigation to address these cases. Please see **Response to Comment A4-02** for additional discussion of the methodology employed in the traffic studies. In addition, it should be noted that both the TIS and Updated TIS include estimated traffic impacts from the operation of the Costco facility.

Response to Comment I94-06

Comment noted. Please refer to **Response to Comments I94-01** through **I94-05** above. Please see **General Response 3.17** regarding the subject of mitigation and best management practices (BMPs).

COMMENT LETTER I95: ROBBIE WHARTON

Response to Comment I95-01

Comment noted. The letter attached by the commenter was submitted as Comment Letter I95. Please see **Responses to Comments I95-02** through **I95-09**.

Response to Comment I95-02

Please see **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, light and signage elements. Please see **General Response 3.12.1** concerning special-status species and **General Response 3.12.2** regarding wildlife habitats. Please also refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments. Please refer to **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City. Please also refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments. Please see **Response to Comment A4-01** regarding the Civic Auditorium. Please see **General Response 3.14** regarding traffic. Please refer to **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services.

COMMENT LETTER I96: MARGARET WOOD

Response to Comment I96-01

Please refer to **General Response 3.12.2** pertaining to potential effects to habitats, **General Response 3.14** regarding traffic and **General Response 3.15** concerning noise. Please also refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, light and signage elements.

COMMENT LETTER I97: DAVID HARVEY

Response to Comment I97-01

Please refer to **General Response 3.14** regarding traffic. Please see **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, light and signage elements. As described in Draft EIS Section 2.3.2, the Proposed Project does not include the operation of a second casino. Rather, gaming would be

relocated to the Strawberry Fields Site, at which point gaming operations would cease at the Tribe's existing Win-River casino.

COMMENT LETTER I98: AL SHUFELBERGER

Response to Comment I98-01

The commenter's concerns regarding a roundabout are acknowledged. As described in **Response to Comment A4-23** and **A8-11**, all proposed mitigation improvements would be constructed in a manner consistent with the applicable agencies' approved standards and adopted plans.

COMMENT LETTER I99: JOHN LIVINGSTON, SHASTA GROUP OF THE SIERRA CLUB

Response to Comment I99-01

Comment noted. Please see **Responses to Comments I99-02** through **I99-13** below.

Response to Comment I99-02

Please see **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, light and signage elements. The NEPA process encourages input from all interested parties, including local residents. The EIS provides information about project alternatives and environment effects to facilitate informed decision making.

Response to Comment I99-03

The Draft EIS includes extensive information and analysis of impacts to the local economy, infrastructure and the environment. Potential socioeconomic impacts were analyzed in Draft EIS Section 4.7. Please refer to **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City. Also refer to **General Response 3.6.3** regarding local socioeconomic effects, including problem gambling, addiction, crime and the provision of law enforcement services. Project infrastructure specifications were identified in Volume I, section 2.0 of the Draft EIS and include descriptions of proposed project alternatives such as new facilities, square footages of each area, locations, access improvements, figures, water supply, architecture, signing, lighting, landscaping, security, law enforcement, grading & drainage, energy, and construction. Offsite improvements are addressed in the Draft EIS in the various sections in which improvements would occur (e.g., utilities, traffic, etc.). Environmental effects are addressed in many sections of the Draft EIS.

Response to Comment I99-04

As stated on page 4.13-2 of the Draft EIS, Alternative A would not result in the removal of any mature trees. Similarly, Alternatives B through D and F do not include the removal of any mature trees. Alternative E (Anderson Site) may result in the removal of several trees in the vicinity of the Tormey Drain. However, native mature trees would be retained to the extent feasible. Habitats on this site, including oak woodland, are highly fragmented and disturbed by adjacent highway and development on

all sides. All tree planting would follow the Shasta County Zoning Code 17.84.040 for landscaping as described in Section 3.13.2 of the Draft EIS.

Response to Comment I99-05

The TIS and Updated TIS do indeed specify the sources of the traffic that would be generated by the project alternatives. Please also see **Responses to Comments A4-2 and T6-101.8**. regarding the methodology employed in the TIS (Draft EIS Appendix F) and the Updated TIS (Final EIS Appendix Q). **Response to Comment T6-101.8** also addresses the data from the Costco River Marketplace project.

Response to Comment I99-06

Please see **Response to Comment A4-23** and **A8-11** regarding site access. The TIS (Draft EIS Appendix F) and Updated TIS specifically incorporate the City's planned diverging diamond interchange with roundabouts, and comprehensively evaluated Bechelli Lane's operations and ability to accommodate the projected peak traffic demands associated with the Proposed Project. As per the *River Crossing Marketplace Specific Plan EIR*, "Under the Year 2040 with Rancheria plus Project scenario…cumulative impacts at intersection #5 [South Bonnyview Road/Bechelli Lane] would be mitigated with implementation of Mitigation Measure TRANS-1.1 [Reconstruct the intersection and approaches into a four-leg, two-lane roundabout in accordance with the specifications of the City Engineer]." The City provided improvement plans for the construction of South Bonnyview Road improvements at Bechelli Lane and the I-5 interchange ramps, the combination of which are understood to be representative of the aforementioned "TRANS-1.1." These improvements have been fully constructed and the facilities were opened to traffic in November 2022. Accordingly, the project has no mitigation responsibility at this intersection and the Updated TIS reflects these changes. Please see **Response to Comment A4-02** for further information.

Response to Comment I99-07

The analysis of construction jobs is only one element of the Draft EIS analyses of jobs, wages, economic growth, and other socioeconomic effects. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Please refer to **General Response 3.6.2** regarding the anticipated effects to local businesses, including hotels and sporting goods retailers located in the City.

Response to Comment I99-08

Please refer to **General Response 3.8.1** pertaining to consistency with local zoning codes and **General Response 3.8.2** regarding the use of agricultural land. Please see **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, light, and signage elements.

Response to Comment I99-09

Comment noted. Please see **General Response 3.11.1**, **3.12.1**, and **3.12.2** regarding impacts to listed fish species and the Sacramento River. See **General Response 3.13.2**, **3.13.3**, and **3.15** regarding impacts from lighting and noise. Please see **General Response 3.9** regarding streambank stabilization measures. All project designs were evaluated in consultation with the National Marine Fisheries Service (NMFS, Final EIS Appendix O-1). NMFS reviewed the project under ESA Section 7(a)(2) and MSMA in a concurrence letter (May 7, 2019) and determined the proposed actions were not likely to affect listed fish species with the inclusion of mitigation measures listed in Draft EIS Appendix D.

Response to Comment I99-10

Please see **General Response 3.15** regarding noise. As described therein, the Proposed Project no longer includes an amphitheater.

Response to Comment I99-11

The commenter's statement that light is a significant unavoidable impact is incorrect. Please see **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, light and signage elements.

Response to Comment I99-12

Neither the former Anderson wood products site nor the site on Clear Creek are feasible project site locations. Please see **General Response 3.5.4** regarding the feasibility of the sites described by the commenter.

Response to Comment I99-13

Please refer to **General Response 3.12** regarding potential impacts to special-status species, including bald eagle. Please also see **General Responses 3.5.2** and **3.5.4** regarding the range of project site alternatives evaluated in the Draft EIS.

COMMENT LETTER I100: LINDA PERKINS

Response to Comment I100-01

Please see **General Response 3.14** regarding traffic.

Response to Comment I100-02

Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, and signage elements. Please see **General Response 3.12.2** regarding wildlife habitats.

COMMENT LETTER I101: DAVE COX, KIXE TV

Response to Comment I101-01

Commenter expresses support for the Proposed Project. Please see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Please also refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I102: KAREN BITHER

Response to Comment I102-01

Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

Response to Comment I102-02

Please see **General Response 3.9** regarding water supply.

Response to Comment I102-03

Please see **General Response 3.14** regarding traffic. Please also refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

Response to Comment I102-04

Comment noted. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

Response to Comment I102-05

Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, and signage elements. Please see **General Response 3.12.2** regarding wildlife habitats. Please also refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

Response to Comment I102-06

Please refer to **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, and signage elements. Please see **General Response 3.8.2** regarding the use of agricultural land.

Response to Comment I102-07

Please refer to **General Response 3.14** regarding traffic.

Response to Comment I102-08

Comment noted. Please refer to **General Response 3.2.1** regarding expressions of opinion and non-substantive comments.

COMMENT LETTER I103: ROYAL MANNION

Response to Comment I103-01

Please see **Responses to Comments I103-02** through **I103-6** below.

Response to Comment I103-02

Please see **Response to Comment A8-05**, **A8-11** and **I63-04** regarding traffic flows at the South Bonnyview Road and Bechelli Lane intersection. Please see **Response to Comment A4-02** regarding the methodology employed in the TIS (Draft EIS Appendix F) and the Updated TIS. Please see **Response to Comment A4-23** and **A8-11** regarding site access. Preliminary engineering assessments were completed for the various project access conditions. This engineering assessment notes impacts to the Hilton Garden Inn parking lot and acknowledges that the loss of parking would need to be mitigated. At this stage in the design of Bechelli Lane improvements, the specifics of this mitigation have not been identified although the mitigation to the parking impacts are anticipated to be accommodated onsite. As per the *River Crossing Marketplace Specific Plan EIR*, "Under the Year 2040 with Rancheria plus Project scenario…cumulative impacts at intersection #5 [South Bonnyview Road/Bechelli Lane] would be mitigated with implementation of Mitigation Measure TRANS-1.1 [Reconstruct the intersection and approaches into a four-leg, two-lane roundabout in accordance with the specifications of the City Engineer]." The City provided improvement plans for the construction of South Bonnyview Road improvements at Bechelli Lane and the I-5 interchange ramps, the combination of which are understood to be representative of the aforementioned "TRANS-1.1." These improvements have been fully constructed and the facilities were opened to traffic in November 2022. Accordingly, the project has no mitigation responsibility at this intersection and the Updated TIS reflects these changes. Please see **Response to Comment A4-02** for further information.

The Bechelli Lane intersection with Sunnyhill Lane has been incorporated in the Updated TIS. This intersection, denoted as Intersection #105, is shown to operate acceptably under all conditions (see Tables 23, 24, 28, and 29). While the traffic volumes through this area are anticipated to increase with the addition of the Proposed Project (Site Access Options 1 and 2 only), the improvements proposed widening of Bechelli Lane will increase its capacity and, as documented, serve to minimize the amount of additional delay experienced at the Sunnyhill Lane intersection.

Please also see **Response to Comment A4-23** regarding the implementation of off-site mitigation improvements. As described in **Response to Comment A4-23**, all proposed mitigation improvements would be constructed in a manner consistent with the applicable agencies' approved standards and adopted plans. Refer to **Response to Comment A4-24** regarding an assessment of private property impacts along Bechelli Lane

Response to Comment I103-03

Please refer to **General Response 3.6.2** regarding the anticipated effects to local businesses. Please see **General Response 3.6.3** regarding potential effects to local property values. Please refer to **General Response 3.6.4** regarding taxes and fiscal effects.

Response to Comment I103-04

Please see **General Response 3.15** regarding noise. As described therein, the Proposed Project no longer includes an amphitheater.

Response to Comment I103-05

The commenter's question regarding the fee-to-trust process is acknowledged. Please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. As described therein, the fee-to-trust process is not arbitrary.

Response to Comment I103-06

Please refer to **General Response 3.7.1** concerning law enforcement and **General Response 3.6.4** regarding the funding for law enforcement. It is common for crimes to occur in one location, but for suspects to be apprehended at a different location. These locational differences tend to be negated in the aggregate, as criminal suspects will tend to travel in both directions, i.e., towards and away from the Proposed Project site.

Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please see **General Response 3.5.4** regarding a substantive discussion of project alternatives.

PUBLIC HEARING SPEAKERS PH1 THROUGH PH47

A transcript of the oral comments provided during the public hearing held on May 20, 2019 is provided in **Attachment A**. Verbal comments submitted during the public hearing did not raise any new substantive environmental issues beyond those contained in the written comment letters that have been responded to throughout this chapter and **Section 3.0**. Therefore, no additional responses are required.

GENERAL NOTE REGARDING COMMENT LETTERS F1 THROUGH F80

The text of comment letters F1 through F80 are highly similar. Consequently, each of the comments included in Comment Letter F1 are responded to below. For subsequent letters F2 through F80, only those comments that are unique have resulted in a response.

COMMENT LETTER F1: BRADFORD EVANS

Response to Comment F1-01

Please refer to **General Response 3.6.3** regarding local socioeconomic effects, including property values, crime, homelessness, problem gambling and addiction. Please see **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, light, and signage elements. Please refer to **General Response 3.14** pertaining to traffic. Please see **General Response 3.12.1** and **General Response 3.12.2** pertaining to special-status species and potential effects to habitat. Refer to **General Response 3.16** for a discussion of air quality. Please refer to **General Response 3.8.1** pertaining to consistency with local zoning codes and **General Response 3.8.2** regarding the use of agricultural land. Please see **General Response 3.3** regarding why Alternative A is described as the Proposed Project and why it best satisfies the purpose and need. Please see **General Response 3.5** regarding a substantive discussion of project alternatives. Refer to **General Response 3.2.1** regarding expressions of opinion.

Please also see **Response to Comments F1-02** through **F1-08** below.

Response to Comment F1-02

Please see **Responses to Comments I90-14 and I98-1.**

Response to Comment F1-03

Please refer to **General Response 3.8.1** regarding consistency with local zoning codes and **General Response 3.8.2** pertaining to the use of agricultural land. Please see **General Response 3.13** for more information regarding light and glare and the aesthetics of the Proposed Project, such as the heights of the various design components, viewpoints, light and signage elements.

Response to Comment F1-04

Please refer to **General Responses 3.12.1** and **3.12.2** pertaining to impacts on special-status species and effects on habitats.

Response to Comment F1-05

Please refer to **General Responses 3.12.1** and **3.12.2** pertaining to impacts on special-status species and effects on habitats.

Response to Comment F1-06

Please see **General Response 3.15** regarding noise. As described therein, the Proposed Project no longer includes an amphitheater.

Response to Comment F1-07

Please refer to **General Response 3.6.2** regarding the anticipated effects to local businesses, including sporting goods retailers located in the City.

Response to Comment F1-08

The Draft EIS includes extensive analyses of job creation, labor income, and economic output, for not only construction activities but also the long-term operation of each alternative. Competitive effects, fiscal impacts and other socioeconomic issues, such as problem gambling and minority populations, are also analyzed in detail. Please see Draft EIS Sections 3.7 and 4.7 where these issues are addressed. Please also refer to **General Responses 3.6.1** regarding economic competition and effects to existing commercial businesses, and **General Response 3.6.2** concerning non-gaming substitution effects and the impacts to local businesses.

Response to Comment F1-09

Please refer to **Response to Comments F1-02** through **F1-08** above.

COMMENT LETTER F2: AUDREY LOCKER

Response to Comment F2-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F3: BRYAN DOAN

Response to Comment F3-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F4: CATHY MAYER

Response to Comment F4-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F5: CHARLE HAZLEHURST

Response to Comment F5-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F6: CHARLOTTE BAILEY

Response to Comment F6-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F7: CHRISTIE BOVEE

Response to Comment F7-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F8: CORRIE MILLER

Response to Comment F8-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F9: DANNY CANNON

Response to Comment F9-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F10: DARREL KELLEY

Response to Comment F10-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F11: DENISE BOEHLE

Response to Comment F11-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F12: GENE CROW

Response to Comment F12-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F13: GREG BOEHLE

Response to Comment F13-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F14: HEIDI PRICE

Response to Comment F14-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F15: JEAN RUSSELL

Response to Comment F15-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F16: JOE VANENKENVORT

Response to Comment F16-01

Please see **Response to Comments F1-01** through **F1-08**. Please see also see **General Response 3.15** regarding noise from the amphitheater. As described therein, the Proposed Project no longer includes an amphitheater.

COMMENT LETTER F17: KATHRYN PATTERSON

Response to Comment F17-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F18: KAYLA BROWN

Response to Comment F18-01

Please see **Response to Comments F1-01** through **F1-08**. Please also see **General Response 3.6.4** regarding fiscal effects and **General Response 3.7.1** pertaining to law enforcement, fire, and EMS.

COMMENT LETTER F19: LEANN OWENS

Response to Comment F19-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F20: MARSHA NELSON

Response to Comment F20-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F21: NANCY EDMONDS

Response to Comment F21-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F22: PATRICIA SOILEAU

Response to Comment F22-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F23: PATRICK CROWLEY

Response to Comment F23-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F24: RAE DEAN BIBLE

Response to Comment F24-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F25: REAGAN LOCKER

Response to Comment F25-01

Please see **Response to Comments F1-01** through **F1-08**. Additionally, as discussed in Draft EIS Section 2.3, the Proposed Project includes closure of the existing Win-River Casino. Thus, only one casino would be in operation.

COMMENT LETTER F26: RICHARD JOHNSON

Response to Comment F26-01

Please see **Response to Comments F1-01** through **F1-08**. Additionally, as discussed in Draft EIS Section 2.3, the Proposed Project includes closure of the existing Win-River Casino. Thus, only one casino would be in operation.

COMMENT LETTER F27: ROBERT SMART

Response to Comment F27-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F28: SHIRLEY GOLDSTEIN

Response to Comment F28-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F29: SUSAN CROWLEY

Response to Comment F29-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F30: TERRY COWAN

Response to Comment F30-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F31: LINDA GEBAUER

Response to Comment F31-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F32: SARAH WICKENHEISER

Response to Comment F32-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F33: TAMI DWINELL-NISBET

Response to Comment F33-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F34: VAN WILLIAMS

Response to Comment F34-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F35: MIKAYLA LOUCKS

Response to Comment F35-01

Please see **Response to Comments F1-01** through **F1-08**. Please also see **General Response 3.10** concerning wastewater, **General Response 3.11** regarding flooding and **General Response 3.15** pertaining to noise from the amphitheater. As described therein, the Proposed Project no longer includes an amphitheater.

COMMENT LETTER F36: KILE MCCLURE

Response to Comment F36-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F37: FRAN MAZET

Response to Comment F37-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F38: GEORGE BOREHAM

Response to Comment F38-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F39: GLEN HARMER

Response to Comment F39-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F40: GORDON WOODMAN

Response to Comment F40-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F41: JOAN GILLETTE

Response to Comment F41-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F42: JOSLYN MITCHELL

Response to Comment F42-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F43: JOYCE CANNON

Response to Comment F43-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F44: LANCE SMITH

Response to Comment F44-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F45: MARILYN SELKE

Response to Comment F45-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F46: MICHAEL MITCHELL

Response to Comment F46-01

Please see **Response to Comments F1-01** through **F1-08**.

COMMENT LETTER F47: NICK & JACKIE SHIDLOVSKY

Response to Comment F47-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F48: PENNY WOODMANSEE

Response to Comment F48-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F49: PHYLLIS SCHWERIN

Response to Comment F49-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F50: ROBBIN BORDEN

Response to Comment F50-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F51: STAN BRIDGES

Response to Comment F51-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F52: STEVEN ANDERSON

Response to Comment F52-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F53: BRENT COLLINS

Response to Comment F53-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F54: BRIAN RICE

Response to Comment F54-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F55: BRIAN WHITE

Response to Comment F55-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F56: CRYSTAL WADZECK

Response to Comment F56-01

Commenter's desire for construction of a boys and girls club is noted. Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**. Please refer to **Response to Comments F1-02** through **F1-08** above. For comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-013**.

COMMENT LETTER F57: DIANA GIFFORD-TUGGLE

Response to Comment F57-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F58: JAN CLARK

Response to Comment F58-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F59: JAN GARNER

Response to Comment F59-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F60: JEANETTE M BELL

Response to Comment F60-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F61: JEN SKELTON

Response to Comment F61-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F62: JONNI-LYNN MALLEY

Response to Comment F62-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F63: KRISTI SCHAFER

Response to Comment F63-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F64: MELODY FOWLER

Response to Comment F64-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F65: PHYLLIS LAWLER

Response to Comment F65-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F66: ROSS JONES

Response to Comment F66-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F67: WILLENE V. L. PURSELL, PH. D.

Response to Comment F67-01

Please see **Response to Comments F1-01** through **F1-08**. For comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-013**. Additionally, as discussed in Draft EIS Section 2.3, the Proposed Project includes closure of the existing Win-River Casino. Thus, only one casino would be in operation.

COMMENT LETTER F68: MONTY APPLE

Response to Comment F68-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F69: STEPHEN PURSELL

Response to Comment F69-01

Please see **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**. Additionally, as discussed in Draft EIS Section 2.3, the Proposed Project includes closure of the existing Win-River Casino. Thus, only one casino would be in operation.

COMMENT LETTER F70: TAMMY COLE

Response to Comment F70-01

Please refer to **Response to Comments F1-01** through **F1-08**. Regarding the commenter's concerns regarding traffic effects of the Proposed Project in combination with other development projects, note that the analysis of traffic impacts in Draft EIS Section 4.8 and the accompanying Traffic Impact Study (Draft EIS Appendix F) include the estimated traffic impacts for these projects. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F71: BRENDA WILSON

Response to Comment F71-01

Please refer to **Response to Comments F1-01** through **F1-08**. Regarding the commenter's concerns regarding traffic effects of the Proposed Project in combination with other development projects, note that the analysis of traffic impacts in Draft EIS Section 4.8 and the accompanying Traffic Impact Study (Draft EIS Appendix F) include the estimated traffic impacts for these projects. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F72: JANET LONDAGIN

Response to Comment F72-01

Please refer to **Response to Comments F1-01** through **F1-08**. Regarding the commenter's concerns regarding cumulative noise effects, please see Draft EIS Section 4.15 where this issue was analyzed. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F73: JEAN MURILLO

Response to Comment F73-01

Please refer to **Response to Comments F1-01** through **F1-08**. Regarding gaming issues that were subject to voter referendum, please see **General Response 3.2.2** regarding gaming regulations and legislative matters that are beyond the scope of the EIS. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F74: JOYCE HANKIN

Response to Comment F74-01

Please refer to **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F75: JULIA SCREECHFIELD

Response to Comment F75-01

Please refer to **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F76: LESLIE EDDLEMAN

Response to Comment F76-01

Please refer to **Response to Comments F1-01** through **F1-08**. Please see **General Response 3.15** pertaining to noise from the amphitheater. As described therein, the Proposed Project no longer includes an amphitheater. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F77: NICK GARDNER

Response to Comment F77-01

Please refer to **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F78: NORMAN BREWER

Response to Comment F78-01

Please refer to **Response to Comments F1-01** through **F1-08**. Also, in response to comment #3, please note that under law enforcement Option #1, the Shasta County Sheriff's Office would have the authority to enforce all non-gaming and state criminal laws on the proposed trust lands. Please see Final EIS, Volume 2, Section 4.10 for more information. Regarding the commenter's statements regarding accountability, please see **General Response 3.17** regarding mitigation and best management practices (BMPs) and **General Response 3.2.2** regarding gaming regulations and legislative matters that are

beyond the scope of the EIS. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F79: RICHARD FYTEN

Response to Comment F79-01

Please refer to **Response to Comments F1-01** through **F1-08**. Please also see Draft EIS Section 4.7 where socioeconomic effects of the project alternatives, including the creation of jobs and economic growth, are analyzed. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

COMMENT LETTER F80: SHAUN VEGA SANCHEZ

Response to Comment F80-01

Please refer to **Response to Comments F1-01** through **F1-08**. Regarding comments referencing Speak Up Shasta, see **Response to Comments I93-01** through **I93-13**.

ATTACHMENTS

LIST OF ATTACHMENTS

ATTACHMENT A DRAFT EIS: COMMENTS
ATTACHMENT B DRAFT EIS: NOTICES OF AVAILABILITY

ATTACHMENT A

DRAFT EIS: COMMENTS

Comment Letter A1

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY GAVIN NEWSOM, GOVERNOR

CENTRAL VALLEY FLOOD PROTECTION BOARD
3310 El Camino Ave., Ste. 170
SACRAMENTO, CA 95821
(916) 574-0609 FAX: (916) 574-0682

BUREAU OF INDIAN AFFS
2019 APR 18 PM 12:3

Reg Dir ad
Dep RD Trust
Dep RD IS
Route DECRMS Chad B
Response Required
Due Date
Memo Ltr
Fax

April 16, 2019

Mr. Chad Broussard
Bureau of Indian Affairs
2800 Cottage Way, Room W-2820
Sacramento, California 95825

Subject: Redding Rancheria Fee-to-Trust and Casino Project, Draft Environmental Impact Statement, SCH Number: 2016114004

Location: Shasta County

Dear Mr. Broussard,

Central Valley Flood Protection Board (Board) staff has reviewed the subject document and provides the following comments:

The proposed project is within the Sacramento River, a regulated stream under Board jurisdiction, and may require a Board permit prior to construction.

The Board's jurisdiction covers the entire Central Valley including all tributaries and distributaries of the Sacramento and San Joaquin Rivers, and the Tulare and Buena Vista basins south of the San Joaquin River.

Under authorities granted by California Water Code and Public Resources Code statutes, the Board enforces its Title 23, California Code of Regulations (Title 23) for the construction, maintenance, and protection of adopted plans of flood control, including the federal-State facilities of the State Plan of Flood Control, regulated streams, and designated floodways.

A1-01

Pursuant to Title 23, Section 6 a Board permit is required prior to working within the Board's jurisdiction for the placement, construction, reconstruction, removal, or abandonment of any landscaping, culvert, bridge, conduit, fence, projection, fill, embankment, building, structure, obstruction, encroachment, excavation, the planting, or removal of vegetation, and any repair or maintenance that involves cutting into the levee.

Permits may also be required to bring existing works that predate permitting into compliance with Title 23, or where it is necessary to establish the conditions normally imposed by permitting. The circumstances include those where responsibility for the works has not been clearly established or ownership and use have been revised.

Other federal (including U.S. Army Corps of Engineers Section 10 and 404 regulatory permits), State and local agency permits may be required and are the applicant's responsibility to obtain.

Board permit applications and Title 23 regulations are available on our website at http://www.cvfpb.ca.gov/. Maps of the Board's jurisdiction are also available from the California Department of Water Resources website at http://gis.bam.water.ca.gov/bam/.

A1-01 (Cont.)

Please contact James Herota at (916) 574-0651, or via email at James.Herota@CVFlood.ca.gov if you have any questions.

Sincerely,

Andrea Buckley
Environmental Services and Land Management Branch Chief

cc: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

SEN. TED GAINES (RET.)
MEMBER
STATE BOARD OF EQUALIZATION
CALIFORNIA'S TAX BOARD

May 20, 2019

Bureau of Indian Affairs
1849 C Street, N.W.
Washington, D.C. 20240

To Whom It May Concern:

As the newly-elected Member for the 1st District on the State Board of Equalization, I am writing in recognition of the Redding Rancheria whose tribal members have lineage to the Pit River, Wintu and Yana people. I had many interactions with the tribe during my 12-year tenure in the State Legislature and can attest to their commitment to the development and well-bring of their tribal members as well as their dedication to all the communities in the Redding region.

The Redding Rancheria has an excellent reputation for community involvement. They take great pride in providing services and programs that support self-sufficiency among their members. Additionally, they are deeply committed to participating in community projects and donating time and funds to charities that benefit individuals and organizations in the greater Redding region.

A2-01

Tribal leaders understand their members are part of a larger community and are dedicated to taking an active role in local development. Tribal members live and work throughout Shasta County and the Tribe is dedicated to staying involved and maintaining open lines of communication with local and state leaders.

I look forward to continuing my partnership with the Redding Rancheria in my new role as Board Member. There are many exciting developments taking place in the Redding region and I believe the Redding Rancheria could play a large role in that positive change. Please do not hesitate to contact me if I can be of further assistance.

Sincerely,

Ted Gaines
1st District

500 CAPITOL MALL, SUITE 1760, SACRAMENTO, CALIFORNIA 95814 • 916-445-2181 • FAX 916-327-4003
44441 16th STREET W, SUITE 101, LANCASTER, CALIFORNIA 93534 • 661-723-8466 • FAX 661-723-8053
WEBSITE: boe.ca.gov/Gaines
EMAIL: Ted.Gaines@boe.ca.gov

Comment Letter A3

DOUG LaMALFA
1st District, California
COMMITTEE ON
NATURAL RESOURCES
COMMITTEE ON AGRICULTURE
COMMITTEE ON
TRANSPORTATION AND INFRASTRUCTURE

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AUBURN DISTRICT OFFICE:
2389 Richardson Way
Auburn CA, 95602
Tel: (530) 878-5035
Fax: (530) 878-5037

http://lamalfa.house.gov

May 10, 2019

The Honorable Tara Sweeney
Assistant Secretary
Bureau of Indian Affairs
U.S. Department of the Interior
1849 C Street N.W.
Washington, D.C. 20240

Dear Ms. Sweeney,

I write to express my support for a land-into-trust application of the Redding Rancheria ("Tribe") pending at the Bureau of Indian Affairs (BIA) to place 232 acres of land in their recently acquired Strawberry Fields territory into trust. The Tribe submitted their application on April 10, 2019. The BIA has stipulated that written comments on the Draft Environmental Impact Statement (DEIS) must arrive within 45 days after the U.S. Environmental Protection Agency (EPA) publishes its Notice of Availability in the Federal Register. I respectfully request the Department issue a limited and reasonable extension of the written comment period to allow adequate time for all interested parties to review the application.

A3-01

The Redding Rancheria was restored to federal recognition in 1984 and began the process of taking the Strawberry Fields property into trust in 2003. The Tribe have always been beneficial stewards of their land and good neighbors of the local community. I firmly believe the replacement gaming facility will continue to benefit both the Rancheria and local residents. If you have any questions, please do not hesitate to contact me directly.

Sincerely,

Doug LaMalfa

Member of Congress

PRINTED ON RECYCLED PAPER

CITY OF REDDING
777 CYPRESS AVENUE, REDDING, CA 96001
(P.O. BOX 496071, REDDING, CA 96049-6071

JULIE WINTER, MAYOR
530.225.4447
530.225.4463 FAX

May 22, 2019
L-010-075-575

Ms. Amy Dutschke
U.S. Department of the Interior
Bureau of Indian Affairs
Pacific Region Office
2800 Cottage Way
Sacramento, CA 95825

Subject: Comments on the Draft Environmental Impact Statement for the Redding Rancheria Fee-to-Trust and Casino Project

Dear Ms. Dutschke:

As a Cooperating Agency pursuant to NEPA for the Redding Rancheria Fee-to-Trust and Casino Project Environmental Impact Statement, the City of Redding appreciates this opportunity to provide comments on the Draft Environmental Impact Statement (DEIS). Our comments are as follows:

ECONOMIC IMPACT

The following excerpts are from Section 4.7.1, Substitution Effects, of the DEIS:

"Potential substitution effects (the loss of customers at existing commercial businesses to the new business) of a tribal casino on existing gaming, restaurant, recreation, and retail establishments have been considered when evaluating the magnitude of the casino's impact on the economy."

A4-01

"A portion of the substitution effects would come from spending on non-gaming categories, such as food and beverage, retail, lodging, and entertainment that would have occurred at the competing gaming operations had the gaming spending occurred there rather than at Alternative A. A smaller portion would come from spending that would have occurred at non-gaming related businesses but went to Alternative A instead."

Although the report identifies a potentially negative economic impact to existing sporting goods stores in the City of Redding, it does not identify how the impact will be mitigated. The report suggests the demand for sporting goods in Shasta County cannot support the proposed store along

with the existing stores. Existing stores can expect to see a 24 percent decrease in sales as a result of the opening of a new store. The closure of existing stores in Redding will result in a decrease in sales tax revenue to the City of Redding, and vacant stores can lead to an increase in unemployment, crime, and blight.

Furthermore, the DEIS fails to provide any analysis of how the two new entertainment venues will impact the Civic Auditorium. The report simply states that the types of shows that would be held at the new venues would not be held at the Civic Auditorium; therefore, there would not be competition among the sites for shows. This simplistic approach fails to recognize that the market for entertainment acts and shows is very limited based upon our population. The auditoriums proposed are nearly the same size as the Civic Auditorium and would certainly accommodate the same types of events and acts. The Civic Auditorium has a long history of operating at a deficit and thereby depleting valuable financial resources from the City's General Fund. It was not until recently that the Civic Auditorium became self-sufficient. Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund.

A4-01 (Cont.)

TRANSPORTATION/CIRCULATION

Review comments on the Traffic Impact Study prepared for the project by Kimley-Horn, provided in GHD's November 17, 2017, memorandum (attached), still applies to the Transportation/Circulation section of the DEIS.

Peak hour vehicle trip generation is derived in the DEIS based on the peak hour of the generator instead of the peak hour of adjacent street traffic. This likely results in under-estimating the project's traffic impacts.

In section 4.8.1, the Hotel trip generation is reduced by 75 percent for internal capture within the proposed development. This seems excessive, given that there would be many attractive options in the immediate area outside of the development. The DEIS needs to provide the supporting documentation for the high reduction rate or use a 50 percent reduction.

Section 5.8.2 identifies mitigation measures for year 2025. These mitigations are for the short-term plus project scenario, not for a cumulative scenario. As such, the proposed project is 100 percent responsible for the identified short-term mitigation measures. Fair share calculations per Caltrans' guidelines apply to the cumulative year (2040) scenario.

A4-02

DEIS Appendix F provides the Traffic Impact Study for the Rancheria project. Page 157 of the Traffic Impact Study references an Appendix I with additional details of the cumulative analysis, which should include the cumulative fair share calculations. However, Appendix I is not provided. The DEIS should provide the cumulative fair share calculations in order to determine if appropriate cumulative mitigation has been identified.

Additional City comments on the Transportation/Circulation section of the DEIS are contained in the attached memorandum from GHD to the City of Redding, dated May 13, 2019.

LAND USE

The following excerpt is from Section 4.9.1, Land Use Plans, of the DEIS:

"Planning documents currently in effect for the Strawberry Fields Site include the Shasta County General Plan (County General Plan) and the Shasta County Zoning Code."

The DEIS fails to acknowledge that the Strawberry Fields Site is within the City of Redding General Plan Area. The general plan land use classifications of this site consists of "Greenway" and "Residential-1 Dwelling Unit per 5 Acres and Larger." Pursuant to the 2017 State of California General Plan Guidelines, general plans must cover the territory within the boundaries of the adopting city or county, as well as "any lands outside its boundaries which in the planning agency's judgement bears relation to its planning" (California Government Code Section 65300). A4-03

PUBLIC SERVICES

ELECTRICITY

The following excerpt is from Section 4.10.1, Alternative A – Proposed Project, of the DEIS:

"The City of Redding's General Plan Policy CDD1G states the following with respect to the provision of public services: "Require annexation before services are provided by the City, except under extraordinary circumstances." As discussed in more detail below, it is anticipated that the City may provide several public services to the project, which could include water supply service, wastewater service, and electricity. Once the property is taken into trust, local land use regulations would not apply, and neither the County (nor the City, should it pursue annexation of the site) would have land use jurisdiction. This would constitute extraordinary circumstances as described by the City's General Plan Policy CDD1G. Therefore, it appears that the provision of public services to the site by the City would be in accordance with General Plan." A4-04

The assumption that electricity to serve the project under Alternative A will be provided by REU is speculative since the subject property is located outside of the Redding city limits. Whether or not electricity is provided by REU to properties outside the city limits is at the discretion of the Redding City Council. Therefore, the DEIS must also include an analysis of Alternative A without electricity provided by REU.

WATER SUPPLY

Under Alternative A, Water Supply Option 1, the City of Redding's water supply system would be extended to the Strawberry Fields Site. Although the City's water service contract with the U.S. Bureau of Reclamation does not permit the City to provide surface water outside of the City's service water contract boundaries, the City has the ability to provide groundwater to the site. Therefore, Alternative A, Water Supply Option 1, is a potentially feasible option, although any such service is at the discretion of the City Council. A4-05

WASTEWATER SERVICE

As specified in Section 4.10.1, Wastewater Service, of the DEIS, additional capacity is needed in the City's wastewater system just north of the Clear Creek WWTP. The project that will address this capacity issue is the Westside Interceptor Phase III pipeline, which is scheduled for construction in FY20/21-FY21/22. Any service of wastewater will be at the discretion of the City Council.

Please make the following edits to the noted portions of the document:

1. First paragraph on page 4.3-7, On-site Water Supply (Option 2): "Wastewater" should be Water Supply.

2. The following excerpt is from the last paragraph on page 4.3-13, Alternative D – Non-Gaming Alternative, Development at the Strawberry Fields Site, Stormwater Runoff:

   "The vegetated swale would have an infiltration capacity of 182 cfs, which is significantly more than the projected 100-year storm event runoff flow of 117 cfs."

Please elaborate on how the 182 cfs of infiltration will be achieved in the vegetated bioswale.

A4-06

AESTHETICS

The following excerpt is from Section 4.13-1, Aesthetics-Operational Impacts, of the DEIS:

"The proposed development would substantially alter the visual character of the northern portion of the site by transforming it from rural, undeveloped greenspace along the Sacramento River to commercial development. However, the proposed development would not be out of character with typical roadside development adjacent to I-5 (such as large commercial developments, including the Mt. Shasta Mall, located along I-5 within the City of Redding), nor would it impede views of scenic resources."

We do not concur with the conclusion that the proposed development would not be out of character with typical roadside development adjacent to I-5 and would not impede views of scenic resources. Within the City of Redding, existing, approved, and proposed developments adjacent to I-5 differ substantially from the character of the proposed project with respect to building mass and height. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Although the proposed height of the parking structure is not specified, it appears to be four stories; there are no existing, approved, or proposed parking structures within the City of Redding adjacent to I-5. As illustrated in Exhibit 4.13-2, the proposed hotel and parking structure would substantially impede the visibility of the mountains, which are currently visible along the west side of I-5 at the City's southern gateway.

A4-07

The proposed sign plan must be more clearly described; it is not clear if the five large panels depicted along the front of the parking structure are proposed signs and, if so, what type of signs are proposed. If these panels are proposed signs, then the project's signage would be substantially

Attachments

cc: Redding City Council
Barry DeWalt, City Attorney
Chuck Aukland, Public Works Director/City Engineer
Chief Roger Moore, Redding Police Department
Chief Cullen Kreider, Redding Fire Department
Daniel Beans, Redding Electric Utility Director
Larry Vaupel, Development Services Director
John Abshier, Assistant Public Works Director

out of character with existing, approved, and proposed signage adjacent to I-5 within the City of Redding. This issue would be further exacerbated if these signs would be electronic message board signs, which are prohibited within the City of Redding.

A4-07
(Cont.)

The City of Redding looks forward to continued cooperation with the BIA regarding this project and would welcome the opportunity to meet with BIA staff, BIA consultants, and/or Redding Rancheria representatives to discuss our comments in further detail.

Sincerely,

Julie Winter
Mayor

Attachments

cc: Redding City Council
Barry DeWalt, City Attorney
Chuck Aukland, Public Works Director/City Engineer
Chief Roger Moore, Redding Police Department
Chief Cullen Kreider, Redding Fire Department
Daniel Beans, Redding Electric Utility Director
Larry Vaupel, Development Services Director
John Abshier, Assistant Public Works Director

omni · means
A GHD Company

Memorandum

To:	City of Redding	**Date:**	November 17, 2017
Attn:	Kent Manual	**Project:**	Redding Rancheria EIS
From:	Russ Wenham Kamesh Vedula, PE, TE		
Re:	Comments from Rancheria EIS	**Job No.:**	25-1809-01
		File No.:	C2226MEM016.DOCX
CC:	John Abshier, PE		

Introduction

City of Redding retained Omni-Means to provide a peer review of the traffic study prepared in support of the Redding Rancheria EIS. Based on direction from the City staff, the peer review focused on the following specific issues::

- Existing Conditions and Volumes: Redding Rancheria EIS & Costco TIAR
- Year 2020 No Rancheria Conditions and Volumes: Redding Rancheria EIS vs Costco TIAR
- Year 2035 Conditions and Volumes: Redding Rancheria EIS vs Bonnyview/I-5 Interchange PSR
- Year 2045 Conditions and Volumes

Existing Conditions and Volumes

Existing Conditions

Both studies used Existing lane geometrics and controls to establish a baseline for intersection traffic operations.

Redding Rancheria Existing Volumes

The Redding Rancheria EIS studied Existing conditions during the Friday PM and Saturday PM peak hour (5 to 7 pm). Intersection turning movement counts were collected in July 2016. This resulted in counts conducted on a non-typical day because area schools were not in session. Additional counts were collected in September 2016 when area schools may have returned back to session. The September 2016 counts were higher than the July traffic counts. **The study states an adjustment was applied to account for the higher traffic counts collected in September but did not state what the adjustment factor was.**

A4-08

Costco TIAR Existing Volumes

The Costco TIAR studied Existing conditions during the Weekday AM (7 to 9 am), PM (4 to 6 pm), and Saturday (11 am to 1 pm) peak hours. Intersection turning movement counts were collected in September 2016. Schools in the area were in regular session.

A4-09

Comparison of Existing Volumes

The Existing Redding Rancheria EIS Friday and Saturday PM peak hour counts were compared to the Costco TIAR Weekday PM and Saturday peak hour counts. This comparison indicated that the Redding Rancheria EIS Friday PM peak hour counts were on average approximately 8% less than the Costco TIAR Weekday PM peak hour counts at the same study intersections.

Conclusion

The existing conditions traffic patterns and the time periods from the Existing Redding Rancheria EIS are not consistent with the traffic patterns from other studies in the project area. Please revise or provide an explanation.

A4-09 (Cont.)

Year 2020 Conditions and Volumes

Year 2020 Conditions

Both studies used Existing lane geometrics and controls to establish Year 2020 intersection traffic operations.

Redding Rancheria Year 2020 No Project Volumes

Year 2020 No Project volumes were developed by straight line interpolation between Existing and Year 2035 No Project volumes. This approach does not take into account the full buildout of the proposed Costco on the northeast quadrant of the intersection of S Bonnyview Rd/Bechelli Ln and Churn Creek Marketplace north of the intersection of S Bonnyview Rd/Churn Creek Rd.

Level of service worksheets were not provided for the interchange area under Year 2020 Conditions. Hence, the operations at the interchange cannot be verified.

Costco TIAR Year 2020 Plus Project Volumes

Year 2020 Plus Project volumes were developed using the Shasta County Travel Demand Model (SCTDM) and methods discussed in the S Bonnyview Rd/I-5 Interchange PSR and by adding traffic generated by the proposed project.

A4-10

Comparison of Year 2020 Volumes

The Year 2020 No Project Redding Rancheria EIS Friday and Saturday PM peak hour volumes were compared to the Costco TIAR Year 2020 Plus Project Weekday PM and Saturday peak hour volumes. When compared, the Redding Rancheria EIS Friday PM peak hour volumes were on average approximately 33% less than the Costco TIAR Weekday PM peak hour volumes at the same study intersections. The difference appears to be from not considering the full buildout of the Churn Creek Marketplace (approved project) and the proposed (approved/pending project).

Conclusion

Intersections deficiencies along the S Bonnyview/I-5 Interchange area appear to be under estimated or not recognized resulting in potential significant project impacts being unidentified. Please revise or provide an explanation.

Year 2035 Conditions and Volumes

Year 2035 Conditions

Both studies used Existing lane geometrics and controls to establish Year 2035 intersection traffic operations.

A4-11

Year 2035 No Rancheria Volumes

The Redding Rancheria's Year 2035 No Project volumes utilized the S Bonnyview/I-5 Interchange PSR Year 2035 volumes provided by Omni Means.

Year 2035 Plus Rancheria Volumes

For the PSR, Year 2035 Plus Rancheria volumes were derived based on a *Trip Generation and Distribution Methodology* Memorandum prepared by Kimley-Horn on September 7, 2016 for the Redding Rancheria development.

When compared to the volumes from the Redding Rancheria EIS, the PSR Year 2035 Plus Rancheria volumes are lower than the Redding Rancheria Year 2035 Plus Rancheria volumes by approximately 7 percent at the intersections of S Bonnyview Rd/Bechelli Ln, S Bonnyview Rd/I-5 SB Ramps, and S Bonnyview Rd/I-5 NB Ramps. The intersections of S Bonnyview Rd/Churn Creek Rd and Churn Creek Rd/Alrose Ln are approximately equal.

Conclusion

Based on a review of the LOS worksheets for Year 2035 No Project conditions from the Redding Rancheria EIS (attached as Appendix A), it appears that all of the study intersections in the vicinity of the S Bonnyview/I-5 Interchange appear to be operating at the cusp of LS D/E or higher. With the addition of the Rancheria traffic it can expected that all of these intersections would operate unacceptably. This is not consistent with the study as it does not identify any deficiencies at this intersection.

Please revise or provide an explanation.

A4-11 (Cont.)

Year 2045 Conditions and Volumes

Year 2045 Conditions

Redding Rancheria EIS

The Redding Rancheria EIS assumed the following geometrics to the S Bonnyview Rd/I-5 Interchange area in the base conditions:

- S Bonnyview Rd/Bechelli Ln: Multi-Lane Roundabout
- S Bonnyview Rd/I-5 SB Ramps: Diverging Diamond Interchange
- S Bonnyview Rd/I-5 NB Ramps: Diverging Diamond Interchange
- S Bonnyview Rd/Churn Creek Rd: Multi-Lane Roundabout

The City of Redding has not adopted these configurations into the City's General Plan. Therefore, the stated improvements are not currently funded within the City's Capital Improvement Program and should not be assumed.

Costco TIAR

The Costco TIAR assumed Existing lane geometrics and controls to establish Year 2045 intersection traffic operations.

A4-12

Study Time Period

Based on review of the daily traffic count sheets provided for the segments along S Bonnyview Rd between Bechelli Lane & Indianwood Drive and Alrose Lane & Hartmeyer Lane, the peak hour appears to be from 4:30 pm to 5:30 pm. Additionally, Caltrans has provided information collected at Rolling Hills Casino which coincides with the PM peak hour being during the traditional peak hours of 4 pm to 6 pm. Therefore, a traditional weekday PM peak hour analysis

A4-13

would be expected to generate higher amounts of traffic than a Friday PM peak hour. Similarly, Saturday traditional noon peak hour would be expected to generate higher amounts of traffic than the PM peak hour.

Next Steps

Upon receipt of the electronic files from Kimley-Horn related to the Redding Rancheria, the review will be expanded to compare Year 2045 No Rancheria and Plus Rancheria volumes, level of service, and any things to note within the files.

A4-13 (Cont.)

Appendix

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	200	1165	30	25	1070	440	25	20	35	715	20	340
Future Volume (veh/h)	200	1165	30	25	1070	440	25	20	35	715	20	340
Number	7	4	14	3	8	18	5	2	12	1	6	16
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1900	1863	1863	1863	1900	1863	1863	1863	1863	1863
Adj Flow Rate, veh/h	217	1266	33	27	1163	478	27	22	38	793	0	370
Adj No. of Lanes	1	2	0	1	2	1	0	1	1	2	0	1
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	380	1201	31	364	1174	525	43	35	69	941	0	420
Arrive On Green	0.21	0.34	0.34	0.41	0.66	0.66	0.04	0.04	0.04	0.27	0.00	0.27
Sat Flow, veh/h	1774	3524	92	1774	3539	1583	999	814	1583	3548	0	1583
Grp Volume(v), veh/h	217	635	664	27	1163	478	49	0	38	793	0	370
Grp Sat Flow(s),veh/h/ln	1774	1770	1847	1774	1770	1583	1813	0	1583	1774	0	1583
Q Serve(g_s), s	12.0	37.5	37.5	1.0	35.5	28.2	2.9	0.0	2.6	23.3	0.0	24.6
Cycle Q Clear(g_c), s	12.0	37.5	37.5	1.0	35.5	28.2	2.9	0.0	2.6	23.3	0.0	24.6
Prop In Lane	1.00		0.05	1.00		1.00	0.55		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	380	603	630	364	1174	525	79	0	69	941	0	420
V/C Ratio(X)	0.57	1.05	1.05	0.07	0.99	0.91	0.62	0.00	0.55	0.84	0.00	0.88
Avail Cap(c_a), veh/h	380	603	630	364	1174	525	305	0	266	1064	0	475
HCM Platoon Ratio	1.00	1.00	1.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.81	0.81	0.81	0.62	0.62	0.62	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	38.7	36.3	36.3	26.1	18.3	17.1	51.7	0.0	51.6	38.2	0.0	38.8
Incr Delay (d2), s/veh	1.7	47.9	47.6	0.1	18.6	15.6	7.8	0.0	6.8	5.7	0.0	16.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	6.1	26.3	27.4	0.5	19.6	14.2	1.6	0.0	1.3	12.1	0.0	12.6
LnGrp Delay(d),s/veh	40.4	84.2	83.8	26.1	36.9	32.7	59.6	0.0	58.4	43.9	0.0	54.7
LnGrp LOS	D	F	F	C	D	C	E		E	D		D
Approach Vol, veh/h		1516			1668			87			1163	
Approach Delay, s/veh		77.8			35.5			59.0			47.4	
Approach LOS		E			D			E			D	

Timer	1	2	3	4	5	6	7	8
Assigned Phs		2	3	4		6	7	8
Phs Duration (G+Y+Rc), s		8.8	26.6	41.5		33.2	27.6	40.5
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0
Max Green Setting (Gmax), s		18.5	5.0	37.5		33.0	6.0	36.5
Max Q Clear Time (g_c+I1), s		4.9	3.0	39.5		26.6	14.0	37.5
Green Ext Time (p_c), s		0.2	0.1	0.0		2.5	0.0	0.0

Intersection Summary	
HCM 2010 Ctrl Delay	53.5
HCM 2010 LOS	D

Notes

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↑↑↑		↰	↑↑						↑	↱
Traffic Volume (veh/h)	0	1335	580	330	935	0	0	0	0	300	0	600
Future Volume (veh/h)	0	1335	580	330	935	0	0	0	0	300	0	600
Number	7	4	14	3	8	18				1	6	16
Initial Q (Qb), veh	0	0	0	0	0	0				0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00				1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00				1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	0	1863	1900	1863	1863	0				1900	1863	1863
Adj Flow Rate, veh/h	0	1451	630	359	1016	0				326	0	652
Adj No. of Lanes	0	3	0	1	2	0				0	1	1
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92				0.92	0.92	0.92
Percent Heavy Veh, %	0	2	2	2	2	0				2	2	2
Cap, veh/h	0	1307	553	339	2124	0				581	0	518
Arrive On Green	0.00	0.75	0.75	0.38	1.00	0.00				0.33	0.00	0.33
Sat Flow, veh/h	0	3674	1485	1774	3632	0				1774	0	1583
Grp Volume(v), veh/h	0	1402	679	359	1016	0				326	0	652
Grp Sat Flow(s),veh/h/ln	0	1695	1601	1774	1770	0				1774	0	1583
Q Serve(g_s), s	0.0	41.0	41.0	21.0	0.0	0.0				16.7	0.0	36.0
Cycle Q Clear(g_c), s	0.0	41.0	41.0	21.0	0.0	0.0				16.7	0.0	36.0
Prop In Lane	0.00		0.93	1.00		0.00				1.00		1.00
Lane Grp Cap(c), veh/h	0	1264	597	339	2124	0				581	0	518
V/C Ratio(X)	0.00	1.11	1.14	1.06	0.48	0.00				0.56	0.00	1.26
Avail Cap(c_a), veh/h	0	1264	597	339	2124	0				581	0	518
HCM Platoon Ratio	1.00	2.00	2.00	2.00	2.00	1.00				1.00	1.00	1.00
Upstream Filter(I)	0.00	0.57	0.57	0.09	0.09	0.00				1.00	0.00	1.00
Uniform Delay (d), s/veh	0.0	14.0	14.0	34.0	0.0	0.0				30.5	0.0	37.0
Incr Delay (d2), s/veh	0.0	56.4	74.1	33.8	0.1	0.0				1.2	0.0	131.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0				0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	28.1	29.5	13.3	0.0	0.0				8.3	0.0	34.6
LnGrp Delay(d),s/veh	0.0	70.4	88.1	67.8	0.1	0.0				31.7	0.0	168.2
LnGrp LOS		F	F	F	A					C		F
Approach Vol, veh/h		2081			1375						978	
Approach Delay, s/veh		76.1			17.7						122.7	
Approach LOS		E			B						F	

Timer	1	2	3	4	5	6	7	8
Assigned Phs			3	4		6		8
Phs Duration (G+Y+Rc), s			25.0	45.0		40.0		70.0
Change Period (Y+Rc), s			4.0	4.0		4.0		4.0
Max Green Setting (Gmax), s			21.0	41.0		36.0		66.0
Max Q Clear Time (g_c+I1), s			23.0	43.0		38.0		2.0
Green Ext Time (p_c), s			0.0	0.0		0.0		47.5

Intersection Summary	
HCM 2010 Ctrl Delay	68.3
HCM 2010 LOS	E

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	680	950	0	0	900	345	360	5	275	0	0	0
Future Volume (veh/h)	680	950	0	0	900	345	360	5	275	0	0	0
Number	7	4	14	3	8	18	5	2	12			
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0			
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00			
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Adj Sat Flow, veh/h/ln	1863	1863	0	0	1863	1863	1900	1863	1863			
Adj Flow Rate, veh/h	739	1033	0	0	978	375	391	5	299			
Adj No. of Lanes	1	2	0	0	2	1	0	1	1			
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92			
Percent Heavy Veh, %	2	2	0	0	2	2	2	2	2			
Cap, veh/h	710	2500	0	0	956	427	387	5	350			
Arrive On Green	0.13	0.23	0.00	0.00	0.36	0.36	0.22	0.22	0.22			
Sat Flow, veh/h	1774	3632	0	0	3632	1583	1753	22	1583			
Grp Volume(v), veh/h	739	1033	0	0	978	375	396	0	299			
Grp Sat Flow(s),veh/h/ln	1774	1770	0	0	1770	1583	1775	0	1583			
Q Serve(g_s), s	44.0	27.2	0.0	0.0	29.7	24.4	24.3	0.0	20.0			
Cycle Q Clear(g_c), s	44.0	27.2	0.0	0.0	29.7	24.4	24.3	0.0	20.0			
Prop In Lane	1.00		0.00	0.00		1.00	0.99		1.00			
Lane Grp Cap(c), veh/h	710	2500	0	0	956	427	392	0	350			
V/C Ratio(X)	1.04	0.41	0.00	0.00	1.02	0.88	1.01	0.00	0.85			
Avail Cap(c_a), veh/h	710	2500	0	0	956	428	392	0	350			
HCM Platoon Ratio	0.33	0.33	1.00	1.00	1.33	1.33	1.00	1.00	1.00			
Upstream Filter(I)	0.09	0.09	0.00	0.00	0.36	0.36	1.00	0.00	1.00			
Uniform Delay (d), s/veh	47.7	22.8	0.0	0.0	35.2	33.5	42.9	0.0	41.2			
Incr Delay (d2), s/veh	23.2	0.0	0.0	0.0	23.8	9.3	47.9	0.0	18.3			
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
%ile BackOfQ(50%),veh/ln	36.2	13.4	0.0	0.0	17.6	11.7	17.1	0.0	10.5			
LnGrp Delay(d),s/veh	71.0	22.9	0.0	0.0	59.0	42.9	90.8	0.0	59.4			
LnGrp LOS	F	C			F	D	F		E			
Approach Vol, veh/h		1772			1353			695				
Approach Delay, s/veh		42.9			54.5			77.3				
Approach LOS		D			D			E				

Timer	1	2	3	4	5	6	7	8
Assigned Phs		2		4			7	8
Phs Duration (G+Y+Rc), s		28.3		81.7			48.0	33.7
Change Period (Y+Rc), s		4.0		4.0			4.0	4.0
Max Green Setting (Gmax), s		24.3		77.7			44.0	29.7
Max Q Clear Time (g_c+I1), s		26.3		29.2			46.0	31.7
Green Ext Time (p_c), s		0.0		25.7			0.0	0.0

Intersection Summary	
HCM 2010 Ctrl Delay	53.3
HCM 2010 LOS	D

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	445	700	80	35	580	155	125	10	25	175	15	535
Future Volume (veh/h)	445	700	80	35	580	155	125	10	25	175	15	535
Number	7	4	14	3	8	18	5	2	12	1	6	16
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1863	1863	1863	1900	1900	1863	1863	1900	1863	1863
Adj Flow Rate, veh/h	484	761	87	38	630	168	136	11	27	190	16	582
Adj No. of Lanes	2	2	1	1	2	0	0	1	1	0	1	1
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	535	888	397	269	684	182	322	26	310	421	35	406
Arrive On Green	0.31	0.50	0.50	0.15	0.25	0.25	0.20	0.20	0.20	0.26	0.26	0.26
Sat Flow, veh/h	3442	3539	1583	1774	2766	737	1647	133	1583	1642	138	1583
Grp Volume(v), veh/h	484	761	87	38	403	395	147	0	27	206	0	582
Grp Sat Flow(s),veh/h/ln	1721	1770	1583	1774	1770	1733	1780	0	1583	1781	0	1583
Q Serve(g_s), s	14.8	20.7	3.4	2.0	24.4	24.5	8.0	0.0	1.5	10.7	0.0	28.2
Cycle Q Clear(g_c), s	14.8	20.7	3.4	2.0	24.4	24.5	8.0	0.0	1.5	10.7	0.0	28.2
Prop In Lane	1.00		1.00	1.00		0.43	0.93		1.00	0.92		1.00
Lane Grp Cap(c), veh/h	535	888	397	269	438	429	348	0	310	456	0	406
V/C Ratio(X)	0.91	0.86	0.22	0.14	0.92	0.92	0.42	0.00	0.09	0.45	0.00	1.43
Avail Cap(c_a), veh/h	563	1287	576	269	450	441	348	0	310	456	0	406
HCM Platoon Ratio	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.88	0.88	0.88	1.00	1.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	37.1	25.7	21.4	40.4	40.3	40.4	38.8	0.0	36.2	34.4	0.0	40.9
Incr Delay (d2), s/veh	16.1	3.7	0.2	0.2	23.8	24.5	3.7	0.0	0.6	0.7	0.0	208.9
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	8.2	10.4	1.5	1.0	14.8	14.6	4.3	0.0	0.7	5.4	0.0	35.8
LnGrp Delay(d),s/veh	53.3	29.4	21.6	40.7	64.2	64.9	42.5	0.0	36.8	35.1	0.0	249.8
LnGrp LOS	D	C	C	D	E	E	D		D	D		F
Approach Vol, veh/h		1332			836			174			788	
Approach Delay, s/veh		37.5			63.4			41.6			193.7	
Approach LOS		D			E			D			F	

Timer	1	2	3	4	5	6	7	8
Assigned Phs		2	3	4		6	7	8
Phs Duration (G+Y+Rc), s		25.5	20.7	31.6		32.2	21.1	31.2
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0
Max Green Setting (Gmax), s		19.8	6.0	40.0		28.2	18.0	28.0
Max Q Clear Time (g_c+I1), s		10.0	4.0	22.7		30.2	16.8	26.5
Green Ext Time (p_c), s		0.5	1.0	4.9		0.0	0.2	0.7

Intersection Summary	
HCM 2010 Ctrl Delay	84.0
HCM 2010 LOS	F

Comment Letter A4

Prepared by NDS/ATD
Prepared by National Data & Surveying Services

VOLUME

S Bonnyview Rd Bet. Bechelli Ln & Indianwood Dr

Day: Saturday
Date: 7/16/2016

City: Redding
Project #: CA16-7488-001

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	10,450	10,601	21,051

AM Period	NB		SB		EB		WB		TOTAL	
0:00	0		0		35		52		87	
0:15	0		0		38		34		72	
0:30	0		0		31		43		74	
0:45	0		0	32	136	43	172	75	308	
1:00	0		0		26		30		56	
1:15	0		0		30		28		58	
1:30	0		0		18		29		47	
1:45	0		0	26	100	23	110	49	210	
2:00	0		0		21		25		46	
2:15	0		0		24		16		40	
2:30	0		0		22		24		46	
2:45	0		0	15	82	17	82	32	164	
3:00	0		0		19		11		30	
3:15	0		0		21		16		37	
3:30	0		0		22		13		35	
3:45	0		0	16	78	16	56	32	134	
4:00	0		0		31		17		48	
4:15	0		0		31		18		49	
4:30	0		0		25		18		43	
4:45	0		0	29	116	16	69	45	185	
5:00	0		0		29		25		54	
5:15	0		0		29		27		56	
5:30	0		0		34		49		83	
5:45	0		0	52	144	38	139	90	283	
6:00	0		0		48		36		84	
6:15	0		0		65		46		111	
6:30	0		0		60		55		115	
6:45	0		0	86	259	61	198	147	457	
7:00	0		0		68		68		136	
7:15	0		0		98		95		193	
7:30	0		0		117		60		177	
7:45	0		0	310	393	96	319	206	712	
8:00	0		0		128		87		215	
8:15	0		0		128		107		235	
8:30	0		0		144		103		247	
8:45	0		0	168	568	129	426	297	994	
9:00	0		0		153		127		280	
9:15	0		0		149		126		275	
9:30	0		0		182		144		326	
9:45	0		0	199	683	148	545	347	1228	
10:00	0		0		151		168		319	
10:15	0		0		158		166		324	
10:30	0		0		194		175		369	
10:45	0		0	208	711	152	661	360	1372	
11:00	0		0		185		169		354	
11:15	0		0		212		189		401	
11:30	0		0		208		176		384	
11:45	0		0	206	811	191	725	397	1536	
TOTALS					4081		3502		7583	
SPLIT %					53.8%		46.2%		36.0%	

PM Period	NB		SB		EB		WB		TOTAL	
12:00	0		0		182		186		368	
12:15	0		0		184		198		382	
12:30	0		0		182		179		361	
12:45	0		0	183	731	185	748	368	1479	
13:00	0		0		186		163		349	
13:15	0		0		177		199		376	
13:30	0		0		168		185		353	
13:45	0		0	174	705	200	747	374	1452	
14:00	0		0		172		178		350	
14:15	0		0		168		166		334	
14:30	0		0		159		168		327	
14:45	0		0	183	682	163	675	346	1357	
15:00	0		0		158		184		342	
15:15	0		0		145		188		333	
15:30	0		0		146		169		315	
15:45	0		0	146	595	176	717	322	1312	
16:00	0		0		150		190		340	
16:15	0		0		180		199		379	
16:30	0		0		180		197		377	
16:45	0		0	170	680	162	748	332	1428	
17:00	0		0		135		208		343	
17:15	0		0		159		156		315	
17:30	0		0		159		158		317	
17:45	0		0	141	594	158	680	299	1274	
18:00	0		0		146		175		321	
18:15	0		0		143		175		318	
18:30	0		0		135		183		318	
18:45	0		0	122	546	141	674	263	1220	
19:00	0		0		135		176		311	
19:15	0		0		112		158		270	
19:30	0		0		127		123		250	
19:45	0		0	111	485	130	587	241	1072	
20:00	0		0		126		126		252	
20:15	0		0		99		120		219	
20:30	0		0		102		112		214	
20:45	0		0	117	444	92	450	209	894	
21:00	0		0		88		109		197	
21:15	0		0		90		109		199	
21:30	0		0		99		115		214	
21:45	0		0	96	373	108	441	204	814	
22:00	0		0		83		99		182	
22:15	0		0		95		100		195	
22:30	0		0		69		78		147	
22:45	0		0	58	305	94	371	152	676	
23:00	0		0		60		70		130	
23:15	0		0		65		79		144	
23:30	0		0		54		47		101	
23:45	0		0	50	229	65	261	115	490	
TOTALS					6369		7099		13468	
SPLIT %					47.3%		52.7%		64.0%	

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	10,450	10,601	21,051

AM Peak Hour	10:45	11:45	11:15
AM Pk Volume	413	754	1550
Pk Hr Factor	0.799	0.493	0.969
7 - 9 Volume	961	945	1706
7 - 9 Peak Hour	8:00	8:00	8:00
7 - 9 Pk Volume	568	426	994
Pk Hr Factor	0.845	0.826	0.857

PM Peak Hour	12:15	16:15	12:00
PM Pk Volume	714	766	1479
Pk Hr Factor	0.960	0.822	0.491
4 - 6 Volume	1274	1428	2702
4 - 6 Peak Hour	16:00	16:30	16:15
4 - 6 Pk Volume	680	768	1451
Pk Hr Factor	0.944	0.921	0.944

Prepared by NDS/ATD

Prepared by National Data & Surveying Services

VOLUME

S Bonnyview Rd Bet. Bechelli Ln & Indianwood Dr

Day: Friday
Date: 7/15/2016

City: Redding
Project #: CA16-7488-001

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	13,994	14,345	28,339

AM Period	NB		SB		EB		WB		TOTAL	
0:00	0		0		37		32		69	
0:15	0		0		25		42		67	
0:30	0		0		34		25		59	
0:45	0	0	0	0	13	109	26	125	39	234
1:00	0		0		24		24		48	
1:15	0		0		15		17		32	
1:30	0		0		12		21		33	
1:45	0	0	0	0	19	70	27	89	46	159
2:00	0		0		23		23		46	
2:15	0		0		12		20		32	
2:30	0		0		12		22		34	
2:45	0	0	0	0	14	61	12	77	26	138
3:00	0		0		26		21		47	
3:15	0		0		17		13		30	
3:30	0		0		34		17		51	
3:45	0	0	0	0	22	99	18	69	40	168
4:00	0		0		22		26		48	
4:15	0		0		25		33		58	
4:30	0		0		41		27		68	
4:45	0	0	0	0	40	128	39	125	79	253
5:00	0		0		44		37		81	
5:15	0		0		59		57		116	
5:30	0		0		87		81		168	
5:45	0	0	0	0	98	288	91	266	189	554
6:00	0		0		90		67		157	
6:15	0		0		128		91		219	
6:30	0		0		156		124		280	
6:45	0	0	0	0	183	557	142	424	325	981
7:00	0		0		156		130		286	
7:15	0		0		204		194		398	
7:30	0		0		242		238		480	
7:45	0	0	0	0	283	885	291	853	574	1738
8:00	0		0		191		160		351	
8:15	0		0		217		175		392	
8:30	0		0		215		201		416	
8:45	0	0	0	0	232	855	183	719	415	1574
9:00	0		0		201		146		347	
9:15	0		0		218		157		375	
9:30	0		0		247		175		422	
9:45	0	0	0	0	278	944	166	644	444	1588
10:00	0		0		219		193		412	
10:15	0		0		200		198		398	
10:30	0		0		202		184		386	
10:45	0	0	0	0	214	835	204	779	418	1614
11:00	0		0		222		198		420	
11:15	0		0		249		227		476	
11:30	0		0		203		208		411	
11:45	0	0	0	0	231	905	232	865	463	1770
TOTALS					5736		5035		10771	
SPLIT %					53.3%		46.7%		38.0%	

PM Period	NB		SB		EB		WB		TOTAL	
12:00	0		0		252		241		493	
12:15	0		0		227		233		460	
12:30	0		0		211		240		451	
12:45	0	0	0	0	238	928	243	957	481	1885
13:00	0		0		219		229		448	
13:15	0		0		218		244		462	
13:30	0		0		221		241		462	
13:45	0	0	0	0	209	867	247	961	456	1828
14:00	0		0		214		237		451	
14:15	0		0		217		240		457	
14:30	0		0		195		230		425	
14:45	0	0	0	0	252	878	254	961	506	1839
15:00	0		0		261		261		522	
15:15	0		0		233		266		499	
15:30	0		0		226		259		485	
15:45	0	0	0	0	236	956	278	1064	514	2020
16:00	0		0		241		278		519	
16:15	0		0		255		241		496	
16:30	0		0		266		296		562	
16:45	0	0	0	0	250	1012	286	1101	536	2113
17:00	0		0		323		309		632	
17:15	0		0		274		318		592	
17:30	0		0		226		253		479	
17:45	0	0	0	0	233	1056	229	1109	462	2165
18:00	0		0		202		232		434	
18:15	0		0		180		219		399	
18:30	0		0		191		200		391	
18:45	0	0	0	0	153	726	182	833	335	1559
19:00	0		0		153		166		319	
19:15	0		0		152		153		305	
19:30	0		0		121		172		293	
19:45	0	0	0	0	103	529	142	633	245	1162
20:00	0		0		95		133		228	
20:15	0		0		125		136		261	
20:30	0		0		100		122		222	
20:45	0	0	0	0	76	396	117	508	193	904
21:00	0		0		108		139		247	
21:15	0		0		104		151		255	
21:30	0		0		86		127		213	
21:45	0	0	0	0	82	380	118	535	200	915
22:00	0		0		99		114		213	
22:15	0		0		86		102		188	
22:30	0		0		73		81		154	
22:45	0	0	0	0	66	324	90	387	156	711
23:00	0		0		68		77		145	
23:15	0		0		52		55		107	
23:30	0		0		40		68		108	
23:45	0	0	0	0	46	206	61	261	107	467
TOTALS					8258		9310		17568	
SPLIT %					47.0%		53.0%		62.0%	

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	13,994	14,345	28,339

AM Peak Hour	9:15	11:45	11:45	PM Peak Hour	16:30	16:30	16:30
AM Pk Volume	962	948	1867	PM Pk Volume	1056	1209	2322
Pk Hr Factor	0.865	0.491	0.485	Pk Hr Factor	0.817	0.872	0.919
7 - 9 Volume	1740	1572	3312	4 - 6 Volume	2068	2210	4278
7 - 9 Peak Hour	7:30	7:15	7:15	4 - 6 Peak Hour	16:30	16:30	16:30
7 - 9 Pk Volume	933	883	1803	4 - 6 Pk Volume	1113	1209	2322
Pk Hr Factor	0.824	0.759	0.785	Pk Hr Factor	0.881	0.850	0.919

Prepared by NDS/ATD

Prepared by National Data & Surveying Services

VOLUME

S Bonnyview Rd Bet. Alrose Ln & Hartmeyer Ln

Day: Saturday
Date: 7/16/2016

City: Redding
Project #: CA16-7488-001

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	4,215	4,142	8,357

AM Period	NB	SB	EB		WB		TOTAL		PM Period	NB	SB	EB		WB		TOTAL	
0:00	0	0	24		10		34		12:00	0	0	91		66		157	
0:15	0	0	17		12		29		12:15	0	0	81		82		163	
0:30	0	0	14		12		26		12:30	0	0	67		87		154	
0:45	0	0	10	65	8	42	18	107	12:45	0	0	84	323	69	304	153	627
1:00	0	0	11		11		22		13:00	0	0	80		66		146	
1:15	0	0	12		7		19		13:15	0	0	83		71		154	
1:30	0	0	8		6		14		13:30	0	0	78		72		150	
1:45	0	0	7	38	6	30	13	68	13:45	0	0	78	319	64	273	142	592
2:00	0	0	10		5		15		14:00	0	0	73		80		153	
2:15	0	0	9		5		14		14:15	0	0	79		77		156	
2:30	0	0	9		5		14		14:30	0	0	66		72		138	
2:45	0	0	5	33	5	20	10	53	14:45	0	0	77	295	65	294	142	589
3:00	0	0	5		3		8		15:00	0	0	70		82		152	
3:15	0	0	6		6		12		15:15	0	0	66		66		132	
3:30	0	0	5		4		9		15:30	0	0	61		71		132	
3:45	0	0	3	19	7	20	10	39	15:45	0	0	68	265	79	298	147	563
4:00	0	0	2		17		19		16:00	0	0	75		59		134	
4:15	0	0	5		3		8		16:15	0	0	66		63		129	
4:30	0	0	4		8		12		16:30	0	0	67		63		130	
4:45	0	0	7	18	8	36	15	54	16:45	0	0	86	294	53	238	139	532
5:00	0	0	9		7		16		17:00	0	0	60		67		127	
5:15	0	0	2		9		11		17:15	0	0	67		56		123	
5:30	0	0	5		13		23		17:30	0	0	63		53		116	
5:45	0	0	8	24	18	52	26	76	17:45	0	0	64	254	50	226	114	480
6:00	0	0	15		17		32		18:00	0	0	65		61		126	
6:15	0	0	12		17		29		18:15	0	0	64		39		103	
6:30	0	0	15		24		39		18:30	0	0	74		64		138	
6:45	0	0	23	65	29	87	52	152	18:45	0	0	51	254	56	220	107	474
7:00	0	0	34		36		70		19:00	0	0	59		49		108	
7:15	0	0	25		46		71		19:15	0	0	60		51		111	
7:30	0	0	30		39		69		19:30	0	0	63		45		108	
7:45	0	0	40	129	57	178	97	307	19:45	0	0	57	239	44	189	101	428
8:00	0	0	28		52		80		20:00	0	0	47		47		94	
8:15	0	0	48		57		105		20:15	0	0	55		43		98	
8:30	0	0	41		60		101		20:30	0	0	57		47		104	
8:45	0	0	49	166	59	228	108	394	20:45	0	0	50	209	40	177	90	386
9:00	0	0	38		90		128		21:00	0	0	48		41		89	
9:15	0	0	49		75		124		21:15	0	0	44		40		84	
9:30	0	0	61		66		127		21:30	0	0	48		32		80	
9:45	0	0	86	234	64	295	150	529	21:45	0	0	45	185	31	144	76	329
10:00	0	0	62		65		127		22:00	0	0	35		23		58	
10:15	0	0	64		81		145		22:15	0	0	33		30		63	
10:30	0	0	65		74		139		22:30	0	0	36		25		61	
10:45	0	0	61	252	68	288	129	540	22:45	0	0	28	132	28	106	56	238
11:00	0	0	59		75		134		23:00	0	0	24		20		44	
11:15	0	0	77		76		153		23:15	0	0	28		24		52	
11:30	0	0	79		84		163		23:30	0	0	29		19		48	
11:45	0	0	85	300	78	313	163	613	23:45	0	0	22	103	21	84	43	187
TOTALS			1343		1589		2932		TOTALS			2872		2553		5425	
SPLIT %			45.8%		54.2%		35.1%		SPLIT %			52.9%		47.1%		64.9%	

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	4,215	4,142	8,357

AM Peak Hour	11:30	11:00	11:00	PM Peak Hour	12:45	12:00	12:00
AM Pk Volume	336	313	646	PM Pk Volume	312	304	627
Pk Hr Factor	0.701	0.932	0.741	Pk Hr Factor	0.940	0.874	0.491
7 - 9 Volume	295	408	703	4 - 6 Volume	548	464	1012
7 - 9 Peak Hour	8:00	8:00	8:00	4 - 6 Peak Hour	16:00	16:15	16:00
7 - 9 Pk Volume	156	228	384	4 - 6 Pk Volume	294	248	532
Pk Hr Factor	0.847	0.950	0.912	Pk Hr Factor	0.855	0.918	0.957

Prepared by NDS/ATD

Prepared by National Data & Surveying Services

VOLUME

S Bonnyview Rd Bet. Alrose Ln & Hartmeyer Ln

Day: Friday
Date: 7/15/2016

City: Redding
Project #: CA16-7488-003

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	5,439	5,408	10,847

AM Period	NB	SB	EB		WB		TOTAL		PM Period	NB	SB	EB		WB		TOTAL	
0:00	0	0	11		14		25		12:00	0	0	68		78		146	
0:15	0	0	13		11		24		12:15	0	0	89		77		166	
0:30	0	0	14		4		18		12:30	0	0	87		87		174	
0:45	0	0	12	50	10	39	22	89	12:45	0	0	86	350	119	361	205	711
1:00	0	0	11		7		18		13:00	0	0	86		87		173	
1:15	0	0	11		7		18		13:15	0	0	83		80		163	
1:30	0	0	8		5		13		13:30	0	0	101		108		209	
1:45	0	0	6	34	11	30	17	64	13:45	0	0	98	368	91	366	189	734
2:00	0	0	10		6		16		14:00	0	0	87		101		188	
2:15	0	0	8		3		11		14:15	0	0	84		85		169	
2:30	0	0	4		4		8		14:30	0	0	85		77		162	
2:45	0	0	5	27	4	17	9	44	14:45	0	0	102	358	86	349	188	707
3:00	0	0	8		4		12		15:00	0	0	101		85		186	
3:15	0	0	3		6		9		15:15	0	0	97		86		183	
3:30	0	0	7		9		16		15:30	0	0	86		94		180	
3:45	0	0	5	23	9	28	14	51	15:45	0	0	115	399	79	344	194	743
4:00	0	0	10		7		17		16:00	0	0	103		80		183	
4:15	0	0	3		8		11		16:15	0	0	116		89		205	
4:30	0	0	6		15		21		16:30	0	0	91		109		200	
4:45	0	0	12	31	21	53	33	84	16:45	0	0	118	428	80	358	198	786
5:00	0	0	5		13		18		17:00	0	0	133		97		230	
5:15	0	0	15		22		37		17:15	0	0	156		102		258	
5:30	0	0	15		29		44		17:30	0	0	110		89		199	
5:45	0	0	30	65	41	105	71	170	17:45	0	0	89	488	84	372	173	860
6:00	0	0	28		46		74		18:00	0	0	90		79		169	
6:15	0	0	26		36		62		18:15	0	0	75		61		136	
6:30	0	0	38		61		99		18:30	0	0	76		76		152	
6:45	0	0	50	142	66	209	116	351	18:45	0	0	64	305	79	295	143	600
7:00	0	0	46		72		118		19:00	0	0	73		45		118	
7:15	0	0	54		89		143		19:15	0	0	64		42		106	
7:30	0	0	77		117		194		19:30	0	0	53		48		101	
7:45	0	0	74	251	133	411	207	662	19:45	0	0	58	248	49	184	107	432
8:00	0	0	88		76		164		20:00	0	0	50		40		90	
8:15	0	0	63		100		163		20:15	0	0	46		52		98	
8:30	0	0	72		99		171		20:30	0	0	60		46		106	
8:45	0	0	73	296	93	368	166	664	20:45	0	0	43	199	50	188	93	387
9:00	0	0	74		68		142		21:00	0	0	53		41		94	
9:15	0	0	80		81		161		21:15	0	0	40		37		77	
9:30	0	0	69		96		165		21:30	0	0	52		36		88	
9:45	0	0	88	311	84	329	172	640	21:45	0	0	48	193	38	152	86	345
10:00	0	0	84		86		170		22:00	0	0	68		30		98	
10:15	0	0	63		83		146		22:15	0	0	44		17		61	
10:30	0	0	74		81		155		22:30	0	0	27		22		49	
10:45	0	0	62	283	77	327	139	610	22:45	0	0	40	179	19	88	59	267
11:00	0	0	88		100		188		23:00	0	0	27		22		49	
11:15	0	0	91		88		169		23:15	0	0	24		21		45	
11:30	0	0	80		70		150		23:30	0	0	20		25		45	
11:45	0	0	78	327	94	352	172	679	23:45	0	0	13	84	15	83	28	167
TOTALS				1840		2268		4108	TOTALS				3599		3140		6739
SPLIT %				44.8%		55.2%		37.9%	SPLIT %				53.4%		46.6%		62.1%

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	5,439	5,408	10,847

AM Peak Hour	11:45	7:30	7:30	PM Peak Hour	16:45	12:45	16:30
AM Pk Volume	342	426	728	PM Pk Volume	445	394	886
Pk Hr Factor	0.872	0.801	0.879	Pk Hr Factor	0.719	0.690	0.859
7 - 9 Volume	547	778	1325	4 - 6 Volume	818	795	1649
7 - 9 Peak Hour	7:30	7:30	7:30	4 - 6 Peak Hour	16:45	16:30	16:30
7 - 9 Pk Volume	302	426	728	4 - 6 Pk Volume	517	488	886
Pk Hr Factor	0.858	0.801	0.879	Pk Hr Factor	0.829	0.890	0.859

May 13, 2019

John Abshier, PE, TE
City of Redding
777 Civic Center Drive
Redding, CA 96001

Original Sent Via Email

Dear Mr. Abshier,

Re: Review of the Transportation/Circulation Sections of the DEIS for the Redding Rancheria Fee-to-Trust and Casino Project

1. Document Review

GHD Inc. (GHD) has reviewed the following documents related to Transportation/Circulation:

- Redding Rancheria Traffic Study Methodology, KHA, May 16, 2016.
- Redding Rancheria Traffic Impact Study Trip Generation and Distribution Methodology, KHA, September 7, 2016.
- NOI Comments, Redding Rancheria Project, City of Redding, December 23, 2016.
- Interstate 5 / S. Bonnyview Road Interchange Traffic Operations Report – Project Study Report, Omni-Means a GHD Company, May 2017.
- Scoping Report, Redding Rancheria, Fee-to-Trust and Casino Project, BIA, May 2017.
- River Crossing Marketplace Specific Plan Traffic Impact Analysis Report, Omni-Means a GHD Company, November 2017.
- Impacts from Proposed Redding Rancheria Memorandum *(River Crossing Marketplace)*, Omni-Means a GHD Company, December 21, 2017.
- Comparison of the *(I-5 / S. Bonnyview Road Interchange)* PSR 2035 Volumes and the TIAR 2020 *(Volumes, River Crossing Marketplace)* Plus Project, Omni-Means a GHD Company, March 20, 2018.
- Errata to the TIAR *(River Crossing Marketplace)*, Omni-Means a GHD Company, April 4, 2018.
- Draft EIS, Redding Rancheria Fee-to-Trust and Casino Project:
  - Section 3.8 Affected Environment – Transportation/Circulation.
  - Section 4.8 Environmental Consequences – Transportation/Circulation.
  - Section 5 Mitigation Measures
  - Appendix F – Traffic Impact Study (TIS)

2. Comments on Transportation/Circulation

The impact analysis and assumptions are contained in Section 4.8 of the DEIS. The information in the DEIS is based on the following KHA documents:

- Redding Rancheria Traffic Study Methodology, May 16, 2016 (TIS Method Memo).

A4-14

GHD
330 Hartnell Avenue Suite B Redding California 96002 United States
T +1 530 242 1700 F +1 530 242 1711 W www.ghd.com

- Redding Rancheria Traffic Impact Study Trip Generation and Distribution Methodology, September 7 2016 (Trip Gen Memo).
- Traffic Impact Study Redding Rancheria, June 2018 (TIS)

A4-14 (Cont.)

2.1 Trip Generation Rates

Numerous assumptions are made with regard to internal capture, the percentages of new trips and the analysis period (see next section). The rates appear to be within the expected ranges.

A4-15

2.2 Analysis Periods

The Redding Rancheria Trip Generation and Distribution Methodology Memorandum, KHA, September 7, 2016, includes the following unsupported statement on page 2:

> "Based on existing traffic volume information and expected trip generation from the Proposed Project, it was determined that the Friday and Saturday PM peak periods represent the worst case periods to evaluate in this traffic impact study. It is during these periods that the combination of background traffic and casino traffic are anticipated to be at the highest levels."

City staff previously advised KHA that the traditional weekday AM and PM, and Saturday mid-day, peak hours should be analyzed for consistency with the work for the Churn Creek Markeplace Shopping Center, the South Bonnyview Road / I-5 Interchange PSR, and the Rivercrossing Marketplace Specific Plan.

The September 7, 2016 memorandum does not provide sufficient supporting information for using Friday and Saturday (5pm-7pm) PM peak periods for analysis. In particular, the Saturday PM peak hour volumes used in the memorandum are significantly lower than the Saturday mid-day peak hour volumes contained in the Rivercrossing Marketplace Specific Plan.

A4-16

2.3 Technical Analysis Parameters

Please provide a list of the technical analysis parameters that were used in this study. These typically include Peak Hour Factor (PHF), cycle length etc.

A4-17

3. Comments on Mitigation Measures

3.1 Global Comments:

A. The validity of the mitigation measures cannot be ascertained since an analysis of the traditional weekday AM and PM peak hours (between 7am-9am and 4pm-6pm) and Saturday mid-day peak hour was not performed. In order for the City of Redding to review the transportation impacts, an analysis of the traditional weekday AM and PM peak hours (between 7am-9am and 4pm-6pm) and Saturday mid-day peak hour is required.

A4-18

B. The existing intersection LOS summaries show significantly better LOS than the City has documented in the River Crossing Marketplace Specific Plan final environmental impact report. An analysis and justification for the differences should be provided in the EIS. A4-19

C. Theoretical fair share percentages need to be provided based on the worst-case of the traditional weekday AM or PM peak hour and the Saturday mid-day peak hour. A4-20

D. The anticipated vehicle queues and the available queues for all scenarios need to be provided in tables for review by the City. Queue tables for the study intersections impacted by the Strawberry Fields and the Win-River expansion alternatives are required due to the complexity of the existing conditions, proposed mitigation measures and the physical constraints. A4-21

E. On April 17, 2018, the City Council adopted the 2018 City of Redding Active Transportation Plan. The DEIS references the City of Redding Bikeway Action Plan: 2010-2015. The project impacts should be considered in the context of the 2018 ATP. A4-22

F. Several mitigation measures may not be feasible due to physical constraints. The project is of sufficient complexity that preliminary engineering designs are required to determine the best and appropriate mitigation measures. A4-23

3.2 Comments on Identified Mitigation Measures (Buildout Year 2025)

Mitigation Measure "A" Construction Phase

1. No comments.

Mitigation Measure "B" South Bonnyview Road / Bechelli Lane (Alt A, B, C & D)

1. Construction of a second WB left turn lane and corresponding receiving lane will require widening South Bonnyview Road and Bechelli Lane into private properties. A4-24
2. Restriping the NB approach is not feasible due to physical constraints. A mitigation measure needs to be proposed that reflects the existing physical constraints.

Mitigation Measure "C" South Bonnyview Road / I-5 SB Ramps (Alt A, B, C & D)

1. A "yield control" at the SB offramp terminus is not acceptable due to downstream (WB) weaving problems that will result. An alternative mitigation measure will be required. A4-25
2. The SB offramp currently experiences queuing onto mainline I-5 during peak periods. It is unlikely that the proposed mitigation will address the impacts.

Mitigation Measure "D" South Bonnyview Road / I-5 NB Ramps (Alt A, B, C & D)

1. No Comments.

4. DEIS Background

The Bureau of Indian Affairs (BIA) published a Notice of Intent (NOI) on November 29, 2016, conducted a public scoping meeting on December 21, 2016 and closed the 30-day comment period on December 29, 2016.

BIA published a Scoping Report in May 2017 and the Strawberry Fields alternatives remain fairly consistent between the Scoping Report and the DEIS.

The Scoping Report indicates that the following comments, specific to transportation, were raised during the public comment period:

- Consider the public transportation needs of new employees. Include bus transit and ridesharing in the transportation analysis.
- Consider the needs of pedestrian and bicycle facilities, along with a safety evaluation to allow for the safe use of pedestrians and cyclists in the project area.
- Address increased traffic from the project.
- The current traffic infrastructure cannot support the increase in traffic. Traffic is already bad and there is no way to fix it.
- Expanding roadways will impact parking at the high schools and endanger small businesses.
- South Bonnyview and Churn Creek Road are already congested, and are constrained by geography.
- Discuss the width of the access road north of the site. Bechelli Lane is inadequate for site access. If a large vehicle breaks down, emergency access will be disrupted.
- Consider a secondary access to the site at the southern part of the property at Smith Road.
- Identify new freeway interchanges required for the project. Redesign the South Bonnyview / I-5 interchange.
- Conduct a comprehensive traffic study for the project. Include trip generation volumes, modal split, routes, impacts, and potential mitigation measures. Have the traffic study include participation from Caltrans, the County, and the City.
- Collaborate with the State of California, City of Redding, and County of Shasta to best define the scope of the proposal (i.e. mix and intensity of land uses) and the traffic impact analysis to ensure that the affected transportation facilities can accommodate the increased demand.
- Consult with the Shasta County Department of Public Works, City of Redding Department of Public Works, and California Department of Transportation regarding traffic impacts and recommended mitigation measures of the project.

- Minimize traffic hazards and facilitate traffic flow to the site.
- Will the Sacramento River Bridge need to be widened?
- Consider an agreement with CORE Shasta Co. to maintain the roads and other infrastructure.
- The scope of the traffic study should be agreed upon by Caltrans, the BIA, the Tribe, the City, the County, and the Shasta Regional Transportation Agency. The agreement should include trip generation rates and trip distribution assumptions.
- Consider increased truck trips to the project site when designing the South Bonnyview Interchange and the intersection of Bechelli Lane and South Bonnyview Road, similar to the Rolling Hills Casino in Tehama County.
- Traffic analysis should reflect project phasing (if any), time frames, and timing of proposed off-reservation mitigation improvements.
- Include mitigation, such as upgrades to local roads, signage, and signaling.
- Consider a bond agreement to offset future traffic impacts.
- Will the Tribe share the cost of traffic mitigation? What power does the local or state government have to negotiate share-of-cost?
- What infrastructure improvements are planned to accommodate the increase in traffic?
- Consider changing the hours of operation to minimize traffic during commute hours.

On December 23, 2016, Paul Hellman, Planning Manager, on behalf of the City of Redding, provided a comment letter to BIA that stated the following relative to traffic impacts:

> *The preparation of a comprehensive traffic impact analysis will be essential to evaluate the potential impacts of the proposal on adjacent State highway interchanges and the local road network. We are hopeful that BIA and the Rancheria will work collaboratively with the State of California, City of Redding, and County of Shasta to best define the scope of the proposal (i.e., mix and intensity of uses) and the related traffic impact analysis to ensure that the affected transportation facilities can accommodate this new demand.*

On December 28, 2016, Lawrence Lees, County Executive Office, on behalf of Shasta County, provided a comment letter to BIA that stated the following relative to traffic impacts:

> *It is likely that the freeway interchange of South Bonneyview Drive, Churn Creek Road and Interstate 5 will be significantly impacted by the Casino Project. The City of Redding is also considering and/or has approved two large commercial projects in close proximity to the interchange which will also add significant amounts of traffic to the interchange. There should be close consultation with the Shasta County Department of Public Works, the City of Redding Department of Public Works, and the California Department of*

Transportation regarding potential traffic impacts of the proposed project, and recommendations for mitigation measures, which may include infrastructure improvements. Options for links to public transportation and for accessibility should be reviewed and considered. Please prepare a traffic study to quantify trip generation volumes, modal split, routes, impacts and potential mitigation measures.

On December 28, 2016, Marci Gonzalez, Office of Community Planning, on behalf of Caltrans, provided a comment letter to BIA that stated the following relative to traffic impacts:

The project is located southwest of the South Bonnyview/Churn Creek Road/Interstate 5 (I-5) interchange in the City of Redding. Past residential developments approved in this area consist of Rivercrest (102- lots), East Oaks (!52-lots), Shastina Ranch (446-lots), Stone Creek Subdivision (133-lots), Stonesfair (118-lots), and Goodwater Estates (87 - lots). The City of Redding also recently approved the development of a 143,225 square foot shopping center to the northeast of the interchange. A large retail development is also contemplated on the northwest side of the interchange. In order to accommodate all of the commercial and residential growth affecting this area, an analysis of the transportation system surrounding the freeway interchange will be critical.

Similar efforts to address the current and future needs of the transportation system and the affected I-5 freeway interchange are currently underway between Caltrans, the City of Redding, Shasta County and the Shasta Regional Transportation Agency. In furthering these efforts, agreement between Caltrans, BIA, the Rancheria, the City of Redding, Shasta County, and the Shasta Regional Transportation Agency on the scope of work for the Rancheria transportation study, should include agreement on basic elements of the analysis including trip generation rates and trip distribution assumptions. This will assist in reaching agreement on the results of the transportation study.

Of particular concern with the relocation of the casino next to the interstate is the opportunity to draw a significant amount of traffic, and specifically truck traffic to the site, similar to what the Rolling Hills Casino has done in Tehama County. This factor alone can greatly affect the ultimate design for the South Bonnyview Interchange as well as the intersection of Bechelli Lane and South Bonnyview Road.

Other elements of the transportation analysis that are important are:

• If the project is proposed to be phased. The analysis should reflect any proposed phases, project time frames, and timing of proposed off-reservation mitigation improvements.

• The reduction of vehicle mile travelled and greenhouse gas emissions. Please consider the needs of pedestrian and bicycles facilities, along with a safety evaluation to allow for the safe use by pedestrian and bicycles in the project area.

- *The analysis should also include bus transit use and ridesharing.*
- *Use of zero emission vehicles to reduce greenhouse gas emissions.*

4.1 Proposed Project

The Redding Rancheria (Tribe) proposes to transfer 232-acres from Shasta County Fee ownership to United States Trust ownership and to construct a casino project. The 232-acre site is referred to as the Strawberry Fields.

The alternatives under consideration are:

Alternative A – Proposed Project

- Development including, but not limited to:
  - A 69,541 sqft casino with 1,200 electronic gaming devices and 36 table games as well as service bars and a player's club. The casino would have a 5,400 sqft porte-cochere.
  - A 1,000 sqft retail shop.
  - A 9-story, 250 room hotel with 171,287 sqft that would include a fitness center, winter garden and spa.
  - Dining facilities with a footprint of approximately 30,565 sqft with 655 total seats between various dining opportunities.
  - A 130,000 sqft big box regional retail facility.
  - A 52,200 sqft multi-purpose event center.
  - A 10,080 sqft conference/convention center.
  - A 19,800 sqft outdoor amphitheater with 1,500 seats.
  - 43,820 sqft of administrative/back of house space.
  - 1,250 parking spaces.

- Note: The site plan (Figure 2-8, shows approximately 26 RV spaces) although GHD was not immediately able to find this feature in the project description.

- Close Win-River Casino and renovate the facility into tribal services and housing.

Alternative B – Proposed Project with no Retail Alternative

- Same as Alternative A but without the 130,000 sqft regional retail facilities

Alternative C – Reduced Intensity Alternative

- Same as Alternative A but at a smaller scale.
    - A 56,412 sqft casino with 825 electronic gaming devices, an undefined number of gaming table games, as well as service bars and a player's club. The casino would have a 5,400 sqft porte-cochere.
    - A 1,000 sqft retail shop.
    - A 9-story, 250 room hotel with 171,287 sqft that would include a fitness center, winter garden and spa.
    - Dining facilities with a footprint of approximately 39,390 sqft with 630 total seats between various dining opportunities.
    - A 130,000 sqft big box regional retail facility.
    - A 52,200 sqft multi-purpose event center.
    - A 10,080 sqft conference/convention center.
    - A 19,800 sqft outdoor amphitheater with 1,500 seats.
    - 36,893 sqft of administrative/back of house space.
    - 1,250 parking spaces.

- Note: The site plan (Figure 2-8, shows approximately 26 RV spaces) although GHD was not immediately able to find this feature in the project description.

- Close Win-River Casino and renovate the facility into tribal services and housing.

Alternative D – Non-Gaming Alternative

- Development would consist of:
  - 95,064 sqft hotel with 128 rooms that would include a fitness center and spa.
    - The hotel would include a 100 seat Café/Deli.
  - Dining facilities with an approximate footprint of 8,112 sqft and 165 total seats between various dining opportunities.
  - 120,000 sqft regional retail.
  - 200 parking spaces.
- Win-River Casino would continue to operate.

Alternative E – Anderson Site Alternative

- Fee-to-Trust transfer of the Anderson site, a 55-acre site located at 3300 Automall Drive in the City of Anderson, CA.
- Development including, but not limited to:
  - A 69,541 sqft casino with 1,200 electronic gaming devices and 36 table games as well as service bars and a player's club.
  - 1,000 sqft retail shop.
  - A 9-story, 250 room hotel with 165,787 sqft that would include a fitness center, winter garden and spa.

- Dining facilities with a footprint of approximately 30,565 sqft with 655 total seats between various dining opportunities.
- 120,000 sqft regional retail.
- A 19,800 sqft outdoor amphitheater with 1,500 seats.
- 43,820 sqft of administrative/back of house space.
- 1,250 parking spaces.

- Close Win-River Casino and renovate the facility into tribal services and housing.

Alternative F – Expansion of Existing Casio Alternative

- Expansion of the existing 141,571 sqft Win-River Casino. The gaming floor would be expanded into the existing 9,826 sqft event center, resulting in a total gaming floor of 42,484 sqft.
- A new 10,000 sqft event center.

Alternative G – No Action Alternative

4.1.1 Site Access

Access to the Strawberry Fields site is analyzed under two options:

Site Access Option 1 - North Access Only

The North Access Improvement Area includes Bechelli Lane, and land located on either side of Bechelli Lane from its intersection with Bonnyview Road to the Strawberry Fields Site. Within the northern portion of the alignment, these areas are mostly paved and currently developed with sidewalks, and parking areas for the Hilton Garden Inn (owned by the Tribe); within the southern portion of the alignment, the proposed improvements areas include disturbed road shoulders, undeveloped land, and the Sunnyhill Lift Station driveway and parking areas.

Under Site Access Option 1, access to the Strawberry Fields Site would be provided from the north only. This option involves widening Bechelli Lane from two lanes to four lanes, which would require the acquisition of additional roadway right-of-way (ROW) from adjacent property owners. The improved Bechelli Lane would consist of four 12-foot lanes and a 4-foot shoulder in each direction, with a 6-foot sidewalk on the western side of the road, to connect the existing sidewalk north of Sunnyhill Lane to the Strawberry Fields Site. This option would encroach into the existing parking lot at the Hilton Garden Inn, owned by the Tribe, located on the south side of Bechelli Lane. A potential location for replacement

parking is noted on **Figure 2-8**. Site Access Option 1 would also require widening and improvements to the existing bridge over the canal located just north of the Strawberry Fields Site on Bechelli Lane. Additionally, the Tribe intends to construct a solid wall at least 6 feet in height around the perimeter of the outdoor pool area at the Hilton Garden Inn to reduce ambient noise associated with increased traffic volumes on Bechelli Lane south of South Bonnyview Road.

Site Access Option 2 - North and South Access

In addition to the North Access described in the preceding section, the South Access Improvement Area includes an existing private access driveway and land located on either side of the driveway from its connection point with the Strawberry Fields Site and intersection with Smith Road to the south. The access driveway is referred to as Adra Way on certain County maps; however, it is not currently a County maintained road. The driveway currently provides access to the Strawberry Fields Site and several rural residential homes and properties located to the east of the drive. Land located immediately adjacent to the driveway consists of front yards of existing rural residential homes and grazing land. As described further in **Section 2.3.2**, the southern Off-site Access Improvement Area would only be modified under one of the options for access to the site.

Under Site Access Option 2, access to the Strawberry Fields Site would be provided from both the north and the south. Improvements to the North Access area would be as described above, and a southern access would be provided through a new roadway connecting the Strawberry Fields Site to Smith Road. The new roadway would be constructed along the alignment of an existing rural driveway (referred to as Adra Way, which is not a County-maintained road) that currently provides access to the Strawberry Fields Site and several private properties located to the east. Per Shasta County development standards, the new roadway would have two 12-foot lanes with 4-foot paved shoulders and a 60-foot designated ROW. Site Access Option 2 would require ROW acquisitions along both the North and South Access areas. Additionally, during the operation of the Proposed Project, the Tribe will set and maintain a speed limit no higher than 30 mph on the portion of the South Access within the Strawberry Fields Site.

5. The DEIS Mitigation Measures

Section 5.8 of the DEIS identifies the following mitigation measures:

5.8 TRANSPORTATION

Where transportation infrastructure is shown as having an unacceptable level of service (LOS) with the addition of traffic from the project alternatives (and caused at least in part from project traffic), the Tribe shall pay for a fair share of costs for the recommended mitigation (including right-of-way and any other environmental mitigation). In such cases, the Tribe shall be responsible for the incremental impact that the added project trips generate, calculated as a percentage of the costs involved for construction of the mitigation measure (referred to as the fair share). The fair share is calculated using the methodology presented in the *Caltrans Guide for the Preparation of Traffic Impact Studies* (2002; **Appendix F**). The Tribe shall make fair share contributions available prior to initiation of project construction. Funds shall be

placed in an escrow account for use by the governmental entity with jurisdiction over the road to be improved so that the entity may design (funding shall be for design standards consistent with those required for similar facilities in the region, unless a deviation is approved by the entity with jurisdiction), obtain approvals/permits for, and construct the recommended road improvement.

5.8.1 Construction

The following mitigation measures shall be implemented in accordance with the applicable jurisdictional agency's regulatory requirements under Alternatives A through F:

A. A traffic management plan shall be prepared in accordance with standards set forth in the California Manual on Uniform Traffic Control Devices (MUTCD) for Streets and Highways (FHWA, 2009). The traffic management plan shall be submitted to each affected local jurisdiction and/or agency. Also, prior to construction, the contractor shall coordinate with emergency service providers to avoid obstructing emergency response service. Police, fire, ambulance, and other emergency response providers shall be notified in advance of the details of the construction schedule, location of construction activities, duration of the construction period, and any access restrictions that could impact emergency response services. Traffic management plans shall include details regarding emergency service coordination. Copies of the traffic management plans shall be provided to all affected emergency service providers.

5.8.2 OPERATION

To prevent violation of federal, state, and local policies related to traffic operations imposed for the protection of the environment (40 CFR 1508.27[b][10]), the following mitigation measures shall be implemented as identified in the Traffic Impact Study (TIS) for the project alternatives (**Appendix F**).

Buildout Year (2025)

Strawberry Fields Site (Alternatives A, B, C, and D)

Site Access Option 1 – North Access Only

The following mitigation measures shall be implemented under Alternatives A through D:

B. South Bonnyview Road / Bechelli Lane. Construct a second westbound (WB) left turn lane and corresponding receiving lane. Restripe the southbound (SB) approach to include two left turn lanes and a thorough/right turn lane. Restripe the northbound (NB) approach to include a left turn lane, a thorough/right turn lane, and a right turn pocket. Add a NB right turn permitted overlap signal phase. Fair share calculations are 56 percent for Alternative A, 43 percent for Alternative B, 53 percent for Alternative C, and 31 percent for Alternative D.

C. South Bonnyview Road / Interstate 5 (I-5) SB Ramps. Construct a SB right turn channelized lane with yield control. Fair share calculations are 44 percent for Alternative A, 30 percent for Alternative B, 40 percent for Alternative C, and 22 percent for Alternative D.

D. South Bonnyview Road / I-5 NB Ramps. Construct a NB left turn lane. Fair share calculations are 30 percent for Alternative A, 19 percent for Alternative B, 27 percent for Alternative C, and 14 percent for Alternative D.

E. Churn Creek Road / Victor Avenue. Install a traffic signal. Fair share calculations are 5 percent for Alternative A, 4 percent for Alternative B, 7.5 percent for Alternative C, and 1 percent for Alternative D.

The following mitigation measure shall be implemented under Alternative A:

F. **South Bonnyview Road / Churn Creek Road**. Construct a SB right turn lane. Fair share calculations are 4 percent.

The following mitigation measure shall be implemented under Alternatives B, C, and D:

G. **South Bonnyview Road / Churn Creek Road**. Add a SB right turn permitted overlap signal phase. Fair share calculations are 2 percent for Alternative B, 3 percent for Alternative C, and 1 percent for Alternative D.

Site Access Option 2 – North and South Access

The following mitigation measure shall be implemented under Alternative A:

H. **South Bonnyview Road / Bechelli Lane**. Construct a second WB left turn lane and corresponding receiving lane. Restripe the SB approach to include two left turn lanes and a thorough/right turn lane. Restripe the NB approach to include a left turn lane, a through/right turn lane, and a right turn pocket. Add a NB right turn permitted overlap signal phase. Fair share calculations are 47 percent.

The following mitigation measure shall be implemented under Alternatives B and C:

I. **South Bonnyview Road / Bechelli Lane**. Restripe the SB approach to include two left turn lanes and a through/right turn lane. Restripe the NB approach to include a left turn lane and a through/right turn lane. Add a NB right turn permitted overlap signal phase. Fair share calculations are 33 percent for Alternative B and 43 percent for Alternative C.

The following mitigation measure shall be implemented under Alternative D:

J. **South Bonnyview Road / Bechelli Lane**. Restripe the SB approach to include two left turn lanes and a through/right turn lane. Restripe the NB approach to include a left turn lane and a through/right turn lane. Fair share calculations are 24 percent.

The following mitigation measures shall be implemented under Alternatives A through D:

K. **South Bonnyview Road / I-5 SB Ramps**. Construct a SB right turn channelized lane with yield control. Fair share calculations are 30 percent for Alternative A, 18 percent for Alternative B, 27 percent for Alternative C, and 13 percent for Alternative D.

L. **South Bonnyview Road / I-5 NB Ramps**. Construct a NB left turn lane. Fair share calculations are 17 percent for Alternative A, 7 percent for Alternative B, 14 percent for Alternative C, and 8 percent for Alternative D.

M. **South Bonnyview Road / Churn Creek Road**. Add a SB right turn permitted overlap signal phase. Fair share calculations are 4 percent for Alternative A, 2 percent for Alternative B, 3 percent for Alternative C, and 1 percent for Alternative D.

N. **Churn Creek Road / Victor Avenue**. Install a traffic signal. Fair share calculations are 5 percent for Alternative A, 4 percent for Alternative B, 8 percent for Alternative C, and 1 percent for Alternative D.

Anderson Site (Alternative E)

GHD did not review Alternative E.

Cumulative Year (2040)

Strawberry Fields Site (Alternatives A, B, C, and D)

Site Access Option 1 – North Access Only

The following mitigation measures shall be implemented under Alternatives A through D:

S. **South Bonnyview Road / Bechelli Lane**. Install a traffic signal with a third eastbound (EB) through lane and a right turn pocket, an additional WB left turn lane, and an additional SB left turn lane. This is consistent with the Alternative 1B concept proposed by Omni-Means. Fair share calculations are 56 percent for Alternative A, 43 percent for Alternative B, 53 percent for Alternative C, and 31 percent for Alternative D.

T. **South Bonnyview Road / I-5 SB Ramps**. Install a diverging diamond interchange at the I-5 NB and SB ramps. This is consistent with the Alternative 4B concept proposed by Omni Means. Fair share calculations are 44 percent for Alternative A, 30 percent for Alternative B, 40 percent for Alternative C, and 22 percent for Alternative D.

U. **South Bonnyview Road / I-5 NB Ramps**. Implement **Mitigation Measure 5.8(T)**. Fair share calculations are 30 percent for Alternative A, 19 percent for Alternative B, 27 percent for Alternative C, and 14 percent for Alternative D.

V. **South Bonnyview Road / Churn Creek Road**. Install a roundabout. This is consistent with the Alternative 4B concept proposed by Omni-Means. Fair share calculations are 4 percent for Alternative A, 2 percent for Alternative B, 3 percent for Alternative C, and 1 percent for Alternative D.

W. **Churn Creek Road / Alrose Lane**. Implement **Mitigation Measure 5.8(T)** and **Mitigation Measure 5.8(V)**. Fair share calculations are 8 percent for Alternative A, 5 percent for Alternative B, 8 percent for Alternative C, and 3 percent for Alternative D.

X. **Churn Creek Road / Victor Avenue**. Install a traffic signal. Fair share calculations are 5 percent for Alternative A, 4 percent for Alternative B, 7.5 percent for Alternative C, and 1 percent for Alternative D.

Y. **Churn Creek Road / Rancho Road**. Add a SB left turn pocket. Fair share calculations are 6 percent for Alternative A, 5 percent for Alternative B, 5 percent for Alternative C, and 1 percent for Alternative D.

Site Access Option 2 – North and South Access

The following mitigation measures shall be implemented under Alternatives A through D:

Z. **South Bonnyview Road / Bechelli Lane**. Add a SB left turn lane. Add a WB left turn lane. Add an EB right turn pocket. Fair share calculations are 47 percent for Alternative A, 33 percent for Alternative B, 43 percent for Alternative C, and 24 percent for Alternative D.

AA. **South Bonnyview Road / I-5 SB Ramps**. Install a diverging diamond interchange at the I-5 NB and SB ramps. This is consistent with the Alternative 4B concept proposed by Omni- Means. Fair share calculations are 30 percent for Alternative A, 18 percent for Alternative B, 27 percent for Alternative C, and 13 percent for Alternative D.

BB. **South Bonnyview Road / I-5 NB Ramps**. Implement **Mitigation Measure 5.8(AA)**. Fair share calculations are 17 percent for Alternative A, 7 percent for Alternative B, 14 percent for Alternative C, and 8 percent for Alternative D.

CC. **South Bonnyview Road / Churn Creek Road**. Install a roundabout. This is consistent with the Alternative 4B concept proposed by Omni-Means. Fair share calculations are 4 percent for Alternative A, 2 percent for Alternative B, 3 percent for Alternative C, and 1 percent for Alternative D.

DD. **Churn Creek Road / Alrose Lane**. Implement **Mitigation Measure 5.8(AA)** and **Mitigation Measure 5.8(CC)**. Fair share calculations are 8 percent for Alternative A, 5 percent for Alternative B, 8 percent for Alternative C, and 3 percent for Alternative D.

EE. **Churn Creek Road / Victor Avenue**. Install a traffic signal. Fair share calculations are 5 percent for Alternative A, 4 percent for Alternative B, 8 percent for Alternative C, and 1 percent for Alternative D.

FF. **Churn Creek Road / Rancho Road**. Add a SB left turn pocket. Fair share calculations are 3 percent for Alternative A, 5 percent for Alternative B, 5 percent for Alternative C, and 1 percent for Alternative D.

Anderson Site (Alternative E)

GHD did not review Alternative E.

We hope that you, the City finds this information helpful.

Sincerely,

GHD

Russell A. Wenham, CE, TE, PTOE
Associate

RW/rw/C2629LTR002

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

June 3, 2019

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

Subject: EPA Comments on the Redding Rancheria Fee-to-Trust and Casino Project Draft Environmental Impact Statement, Shasta County, California (EIS No. 20190061)

Dear Ms. Dutschke:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. EPA is a cooperating agency on the project and provided scoping comments (December 28, 2016) and comments on the Administrative Draft EIS (November 20, 2017).

The Proposed Action includes a 232-acre trust acquisition and development and operation of a casino, hotel, event center, and development of a big box retail facility in Shasta County, California, approximately 1.6 miles northeast of the existing Redding Rancheria, and about two miles southeast of downtown Redding. The new facility would replace the Tribe's existing casino, and the existing casino buildings would be converted to a different use. No BIA preferred alternative is identified.

Our main comments submitted on the Administrative DEIS in November 2017 regarded drainage/floodplain issues and wastewater management. While the project development site is within a currently designated 500-year floodplain, historical evidence shows that overflow from Churn Creek to the Sacramento River occurs in flood events smaller than the most probable 100-year flood. In a changing climate, floods and droughts are likely to become more common and more intense as regional and seasonal precipitation patterns change and rainfall becomes more concentrated into heavy events.. Preserving floodplains is vital for adapting to larger more intense storms. The project proposes management of the floodwaters from Churn Creek, along with the stormwater that will be generated from the project's new impervious surfaces, and possibly treated wastewater, should the on-site wastewater treatment option be pursued. It relies on avoidance of the 100-year floodplain. We continue to advise towards conservative preservation of floodplains and maximum reduction of impervious surfaces in flood-prone areas. Therefore, as provided to BIA through comments on the Administrative DEIS, we continue to recommend selection of Alternative B, which includes the same sized hotel, casino, and event center as the proposed action but would allow for an appropriate development setback from the Sacramento River and a substantial reduction (10 acres) in impervious surface on the site. Please see the attached detailed comments further describing this recommendation, and others, including wastewater treatment/disposal options and flood safety considerations. A5-01

Effective October 22, 2018, EPA no longer includes ratings in our comment letters. Information about this change and EPA's continued roles and responsibilities in the review of federal actions can be found on our website at: https://www.epa.gov/nepa/epa-review-process-under-section-309-clean-air-act.

EPA appreciates the opportunity to review this DEIS. When the FEIS is released for public review, please send one copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 947-4161, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

A5-01 (Cont.)

Sincerely,

Connell Dunning

Connell Dunning, Acting Manager
Environmental Review Branch

Enclosures: EPA's Detailed Comments

cc: Jack Potter, Chairman, Redding Rancheria
Darrah Hart, EPA Manager, Redding Rancheria

EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT, REDDING RANCHERIA FEE-TO-TRUST AND CASINO PROJECT, SHASTA COUNTY, CALIFORNIA, JUNE 3, 2019

Preserving Floodplains for Maximum Resilience

In our comments on the Administrative DEIS, we highlighted that flooding from Churn Creek, across from Interstate 5, is conveyed as shallow overflow across the proposed project site before entering the Sacramento River. Historical evidence shows that this overflow occurs in flood events smaller than the most probable 100-year flood. While the development site, adjacent to the Sacramento River, is on a strip of land in the 500-yr floodplain, it abuts the 100-yr floodplain to the east and the west. The flooding history of the site indicates it is located in an active floodplain. Floods and droughts are likely to become more common and more intense as regional and seasonal precipitation patterns change and rainfall becomes more concentrated into heavy events, with longer, hotter dry periods in between. Preserving floodplains is vital for managing larger more intense storms and providing the resiliency to adapt to future climate conditions.

In our comments on the Administrative DEIS, we suggested that BIA rely on future conditions that the area is likely to experience during the project's lifetime, rather than past conditions, when assuming what flood risk criteria to use for project siting and design of the stormwater management system. We recommended including a discussion in the DEIS of the assumptions used regarding precipitation extremes and how the system would accommodate future flood regimes. We also recommended oversizing new stormwater systems to account for potential future problems of peak runoff.

We appreciate the additional information in the DEIS that addresses some of these issues. The DEIS references the City of Redding Department of Public Works Hydrology Manual but does not identify the assumptions for future rainfall that were utilized. Appendix C indicates that the project is relying on the FEMA 100-year floodplain for its analysis (Appendix C, p. 14). FEMA, in its guidance document "Further Advice on Executive Order 11988 – Floodplain Management" stated that "in light of increasing flood damages occurring outside of the designated 100-year floodplain, it may be appropriate to consider using a higher flood standard for proposed activities which are funded, either directly or indirectly, by the federal government". While this project is not funded by the Federal government, the advice is valid for protecting assets associated with government actions. A1-02

Because of the flooding issues, the project plans to engineer changes to the flows on the site, constructing a 40-foot wide, 5-foot deep vegetated swale between the access road and Interstate 5 that would convey project runoff, and as well as provide a bypass channel for the 600-700 cubic feet per second flow that could come from Churn Creek during extreme rain events. We appreciate that the proposed channel has been oversized by 35% to accommodate increases in peak runoff that might occur in the future, and that the on-site storm drain conveyance system will be designed using local jurisdiction requirements but will be upsized by 25% (Appendix C, p. 24). The DEIS also states, in response to our comments, that no levees will be constructed as part of this project, to preserve floodplain capacity (App C, p. 20).

> ***Recommendation***: In the Final EIS, we recommend a brief discussion of the rainfall assumptions used in designing the water management system, those used in local jurisdiction requirements, how the upsizing percentages were calculated, and what size storms the infrastructure is designed to accommodate. Include a brief discussion on how the project, located in the Sacramento River floodplain, will be built with consideration of resilience, given future conditions. Preserving the maximum amount of pervious surface is one way to include consideration of resilience, and Alternative B includes the full-sized casino, hotel, and event

center while preserving 10 additional acres of pervious surface on the river. We recommend this alterative be strongly considered over the proposed action.

We also suggest including flooding issues in the discussion of climate change on p. 4.15-14.

A5-02 (Cont.)

Setback from Sacramento River

The DEIS states that the bank of the Sacramento River, directly adjacent to the project site, is actively eroding from periods of very high flows; therefore, the project includes streambank stabilization measures along the river. As part of the Proposed Project, the upper loam portion of the riverbank will be stabilized by removing existing stream bank material above the ordinary high-water mark and placing a row of rock boulders over the existing alluvium up to at least the flood water surface elevation of the river (p. 2-20). We understand that the BIA and the Tribe are working with the Army Corps of Engineers regarding potential permitting. Please note that EPA Region 9 is the permitting agency for Clean Water Act Section 401 Water Quality Certification. Joe Morgan will be the Region 9 contact for the certification and can be reached at 415-972-3309 or morgan.joseph@epa.gov.

We agree that this stabilization project will reduce erosion and is needed; however, since this area is subject to erosion as a result of the river's configuration, the project should plan for potential future erosion under extreme rainfall and flooding conditions. As presented, the site design in Figure 2-8 for the Proposed Action (Alternative A) locates project facilities close to the river. It is unclear where the streambank will lie after the stabilization work, but it appears that the northern portion of the development is less than 50 feet from the 100-yr floodplain boundary and portions of the hotel area are around 75-100 ft from the floodplain boundary, although this is a rough estimate as no information regarding setback is provided in the DEIS. The DEIS, Appendix C (p. 14) implies no setback will be considered since it states that FEMA does not have setback guidelines from river channels. We emphasis the importance of setback from major waterways, and note that the City of Redding's waterway corridor setback requirements are 150 feet from the top of the bank,[1] in support of the values of river corridor habitats for maintaining diversity of plants and animals, recharging aquifers, filtering pollutants, and providing valuable open-space and scenic areas. While these City setback requirements are not applicable on tribal land, providing adequate buffer areas between river corridors and adjacent development protects these valuable resources, consistent with NEPA's goals.

A5-03

Recommendation: To lessen impacts to the river and floodplain, we recommend a project setback from the Sacramento River of 200 feet, with 50-100 feet as vegetated buffer, as measured after the streambank stabilization work. We strongly recommend against a setback less than 150 feet from the top of the bank. We recommend including this commitment in the selected project design. We note that Alternative B would allow for a site design that shifts development to the north and closer to Interstate-5, expanding the buffer between it and the Sacrament River, and would be more protective of both the project facilities and river corridor ecosystem values.

Onsite Wastewater Treatment and Disposal

In our comments on the Administrative DEIS, we noted that if onsite wastewater treatment and disposal is pursued, it presents additional concerns. Appendix B indicates that County sewage disposal standards prohibit subsurface disposal systems on land subject to flooding (p. 13). A water table that is too high can impair the drain field and also lead to contamination of groundwater. We requested that the DEIS

A5-04

[1] http://www.cityofredding.org/home/showdocument?id=5515

identify the depth to shallow groundwater at the site and discuss this potential impact; however, the DEIS does not appear to include this information.

Appendix B indicates that no onsite soil and subsurface explorations were done to obtain percolation rates and other parameters necessary to fully evaluate and consider the leach field disposal option in detail. It states that design of any onsite subsurface disposal system will require actual site-specific explorations and soil classifications, and that percolation tests will be required and possibly groundwater monitoring for design. Additionally, while the DEIS indicates no levees will be constructed and therefore no change to the floodplain capacity will occur, Appendix B states on p. 13 that if the storage pond is located in the floodplain, levees could also be constructed around the pond to protect it from flood conditions, if required and necessary.

> ***Recommendations***: Because of existing site constraints, EPA recommends off-site wastewater disposal for the project (see comment below). If the onsite wastewater treatment and disposal is pursued, we recommend additional NEPA analysis, to include the necessary studies to determine the impacts that such a system would have on water resources and public health and safety. Impacts of a subsurface disposal system should be evaluated, since the land is subject to flooding, and sprayfields should be avoided since the DEIS indicates levees could be required to protect the sprayfield from flooding, which is not consistent with statements in the DEIS that no levees will be constructed as part of the project to maintain existing floodplain capacity (p. 4.3-2). We refer BIA and the Tribe to this guidance document intended to help tribal nations determine what level of management or tribal regulation will work best to ensure public health and protect the environment: See https://www.epa.gov/sites/production/files/2015-08/documents/tribalowtsmgmt.pdf

A5-04 (Cont.)

Offsite Wastewater Disposal

The DEIS identifies limitations with the West Side Interceptor, just north of the Clear Creek Wastewater Treatment Plant, to serve the project since it is currently at capacity and experiences localized overflow during storm events. It indicates that flows from the Proposed Action would contribute to unacceptable operating conditions at this facility; however, the City's planned interceptor expansion will occur in 2022 and will sufficiently increase capacity to serve the project. Should the project be operational prior to the completion of these improvements, the DEIS states that the Tribe shall construct an equalization storage tank, with a capacity of at least 362,000 gallons, for storage of wastewater generated during 10-year, 24-hour storm events when the City's conveyance system is over capacity until the peak event has subsided and flows are below the capacity of the pipeline conveyance system (p. 5-17).

> ***Recommendation:*** EPA recommends that the project not contribute flows to the West Side Interceptor until it has been upgraded so as not to contribute to unacceptable operating conditions at this facility. If the project is operational prior to completion and equalization basins are constructed, we recommend coordination with the Clear Creek Wastewater Treatment Plant on design and operation to ensure impacts to their system are minimized.

A5-05

Flood Safety

In our comments on the Administrative DEIS, we noted that the cut and fill diagram in Figure A5 in Appendix C indicates that there will be cut in the area that may contain the access road. We commented that BIA and the Tribe should ensure that all access routes, including walkways, driveways, and roadways be located on land with elevation not less than the base flood elevation and with evacuation routes leading directly out of the floodplain area. Ensuring that building sites are relatively accessible

A5-06

during floods decreases the likelihood of stranded patrons, increases public safety, and reduces the need for water rescues which places emergency personnel at risk. We appreciate that the DEIS, Appendix C, p. 6 now states explicitly that, for safety, all access routes from the building sites to the access road will be elevated above the FEMA 100-year floodplain. It also states that hazardous materials will not be stored within the 500-year floodplain of the proposed development (App C, p. 11).

A5-06 (Cont.)

> ***Recommendation:*** Ensure this safety design element is retained in the final project design with evacuation routes above the 100-year floodplain, at a minimum, leading directly out of the floodplain area. Ensure no hazardous materials of any kind are stored in basements that are most vulnerable to flooding.

Aesthetics

The impact assessment for aesthetics assesses impact from 5 viewsheds. Viewshed D is experienced by residences bordering the western (opposite) bank of the Sacramento River from a distance of 2000 feet and the DEIS concludes no significant visual impacts would occur. However, no assessment of viewshed impacts from the Sacramento River itself, as would be experienced by boaters and recreationalists, is included. The California Divison of Boating and Waterways has published *A Boating Trail Guide to the Sacramento River from Redding to Red Bluff*[2] and describes the 54-mile stretch of the Sacramento between Redding and Red Bluff as one of the most pristine stretches of the river. The 21-mile stretch from Redding to Balls Ferry, while not as spectacular, is described as perfect for scenic touring and shorter trips, with beaver, black-tail deer, river otter, and ring-tail cat among the wildlife commonly seen north of Balls Ferry.

A5-07

> ***Recommendation:*** Because this stretch of Sacramento River is promoted as a scenic recreational destination, we recommend viewshed impacts from the river be evaluated in the FEIS. Identify in the FEIS any changes to project design and location if viewshed impacts warrant project siting changes.

[2] https://dbw.parks.ca.gov/?page_id=29490

Shasta County

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June 11, 2019

Sent via U.S. Mail & E-mail to: amy.dutschke@bia.gov

Amy Dutschke, Regional Director
U.S. Department of the Interior
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

RE: Redding Rancheria Fee-to-Trust and Casino Project, Draft Environmental Impact Statement

Dear Ms. Dutschke:

The County of Shasta (County) submits these comments regarding the Draft Environmental Impact Statement (Draft EIS) for the Redding Rancheria Fee-to-Trust and Casino Project. As a cooperating agency, the County previously submitted a comment letter to your office dated December 28, 2016, in response to the Notice of Intent. On March 15, 2019, the County requested that BIA consider the County's comments on the Administrative Draft EIS prior to releasing the Draft EIS for public comment to ensure that the Draft EIS properly reflected the impacts the proposed development will have on the County. The County was disappointed that this request was not granted, as it would have allowed BIA to address a number of issues that require further evaluation. A6-01

The County provides the following comments on the Draft EIS:

1. **There must be an enforceable mitigation agreement in place before BIA can conclude that impacts will be mitigated to insignificant levels.**

The Draft EIS reflects that certain significant impacts will be mitigated to less than significant levels via mitigation. *See e.g.*, DEIS 1-4 ("The ROD will also identify and discuss all such factors that were balanced by the agency and discusses whether all practicable mitigation measures have been adopted to minimize the environmental effects. If all practicable measures are not adopted, the BIA must state why such measures were not adopted. A monitoring and enforcement program shall be adopted and summarized within the ROD where applicable for any mitigation (CEQ Regulations for Implementing A6-02

NEPA, 40 CFR §1505.2)."); DEIS 2-21 ("Protective measures and BMPs have been incorporated into the design of Alternative A. Where applicable, these measures will be incorporated into any design or construction contracts to eliminate or substantially reduce environmental consequences from Alternative A."); DEIS 5-18 ("Prior to operation the Tribe shall enter into a service agreement to reimburse the Shasta County Fire Department (SCFD) for additional demands caused by the operation of the facilities on trust property. The agreement shall address any required conditions and standards for emergency access and fire protection systems.").

The County is working with the Tribe to negotiate an Intergovernmental Mitigation Agreement to address the impacts the proposed casino will have on the County and is confident that it will work out a comprehensive mitigation agreement with the Tribe that adequately addresses the project's impacts. The County has confidence that the Redding Rancheria wishes to ensure that project impacts will be properly mitigated. If the parties fail to reach such an agreement, however, the EIS cannot reflect that impacts will be mitigated based on statements in the EIS or a record of decision (ROD).

As you know, BIA does not have the authority to require the Tribe to mitigate impacts or negotiate agreements with local entities to ensure that mitigation is implemented. Nor does it enforce mitigation measures it sets forth in an EIS or a ROD. The Department has long maintained that the use of trust lands cannot be restricted or conditioned through the trust acquisition process. In addition, the Department's trust acquisition regulations require that land be placed in trust "immediately" after a final decision approving the trust acquisition request. It thus cannot ensure that a mitigation agreement will be entered into by the parties after the land is taken into trust, and it cannot delay acquisition of the land, pending such an agreement, after a final decision to place the lands into trust. Accordingly, the statements in the Draft EIS that certain mitigation "shall" occur is misleading. Unlike many other federal permits where agencies can enforce the required mitigation, there is no similar mechanism in trust acquisition cases. Unless there is an enforceable mechanism in place, whether mitigation will occur is speculative. Unenforceable assurances do not provide a reasonable basis to conclude that significant impacts will be mitigated.

A6-02
(Cont.)

As the County noted above, it is working to negotiate a mitigation agreement with the Tribe in good faith, but the County recognizes and respects that the Tribe is a sovereign Indian nation whose duty is to act in the best interests of its people. Where those interests are in tension with the County's, reaching an agreement may prove to be difficult. The issues that the Tribe and the County face are disparate and may admit to no easy solutions. The negotiation of an enforceable mitigation agreement is a complex and highly discretionary political process between governments, whose outcome cannot be dictated by the County, the Tribe, or BIA. It would be presumptive and dismissive of tribal sovereignty and principles of federalism for BIA to assume the outcome of such complex, government-to-government negotiations by determining that impacts will be mitigated and to what extent in the absence of an agreement.

An EIS must accurately reflect the environmental impacts of the proposed action. The nature and extent of those impacts cannot be determined without knowing the specific provisions of the final mitigation agreement—if any is reached—and the extent to which the negotiated mitigation addresses the full scope of impacts. In addition, it is entirely possible that the parties may reach a compromise that is mutually beneficial overall and in the public interest, but that nonetheless does not specifically provide for the full mitigation of some impacts. Supplementation of the EIS may be necessary to evaluate those impacts which remain unmitigated, or only partially mitigated, under any final mitigation agreement. That is the reason that the County suggested in its March 15, 2019, letter that BIA delay the release of the Draft EIS until after the County and the Tribe have executed a mitigation agreement so that the Draft EIS could accurately reflect that some project impacts will be mitigated. As it stands now, however, the Draft EIS is inaccurate

because it improperly reflects that impacts will be mitigated when there is no basis for that statement.

The County looks forward to reaching an agreement with the Tribe and will, at that time, provide information to BIA as to the adequacy of the mitigation. Until such time, however, it is the County's position that significant impacts will not be mitigated. A6-02 (Cont.)

2. The mitigation agreement must address public services.

Law Enforcement:

Please refer to the attached comments from Sheriff Tom Bosenko dated May 22, 2019. In summary, additional full-time patrol deputies, additional equipment and infrastructure, and possible improvements to the Sherriff's Office Boating Safety Unit will need to be addressed. The Draft EIS states that there is "no definitive link between casinos and crime." DEIS 4.7.11. BIA should review a more recent assessment of casino impacts on law enforcement that focuses on California to determine impacts. Between January 1, 2017 and October 10, 2018, there were 1,351 law enforcement incidents at the current casino, including rape, robbery, aggravated assault, burglary, and larceny.

It is likely that the proposed project would result in an increased impact on law enforcement, given the expected increase in patrons. The impacts of the proposed development to the following law enforcement public service providers are not addressed in the Draft EIS: Shasta County District Attorney's Office (see attached letter from Stephanie Bridgett, Shasta County District Attorney); Shasta County Public Defender's Office; and Shasta County Probation Department. Please address the impacts of the proposed development to these law enforcement public service providers. A6-03

With respect to proposed Law Enforcement Mitigation Measure E on page 5-17, it cannot be assumed that the impacts will be mitigated in the absence of an enforceable agreement that ensures that the mitigation will occur. To date, no such agreement has been reached between the County and the Tribe.

In addition, by letter of May 30, 2019, the Tribe's Chief Executive Officer, Tracy Edwards, noted the ongoing problems with crime originating off tribal lands but crossing back onto tribal lands. A new facility will likely alter that pattern to a new location, which is an issue that should be addressed in the Draft EIS. The County does not know the full scope of the issue the Tribe currently faces, but the proposed facility would result in development in a currently rural area, which is likely to increase the same issues the Tribe currently faces to additional land within the County's jurisdiction.

Fire Protection and Emergency Services:

Please refer to the attached comments from Chief Bret Gouvea dated May 31, 2019. As stated therein, Cal Fire and Shasta County Fire Department do not have automatic aid agreements for the proposed site and there is no applicable agreement with federal cooperators.

The Draft EIS states that "[t]o prevent violation of federal, state, and local policies related to fire protection and emergency services imposed for the protection of the environment," the Tribe shall enter into a service agreement to reimburse the Shasta County Fire Department (SCFD) for additional demands caused by the operation of the facilities on trust property. The agreement shall address any required conditions and standards for emergency access and fire protection systems." DEIS 5-18. A6-04

It is improper for BIA to assume that the impacts will be mitigated in the absence of an enforceable agreement that ensures that the mitigation will occur. The direction set forth in the Draft EIS is not enforceable. Nor would it be enforceable if set forth in a record of decision because BIA does not have the power to require the Tribe to negotiate an agreement, nor compel the County to do so. BIA cannot reasonably conclude that impacts will be mitigated until an enforceable agreement has been reached between the County and the Tribe. A6-04 (Cont.)

3. The proposed casino will have significant traffic and circulation impacts.

The proposed project at the Strawberry Fields Site (Project) would generate a significant increase in traffic during construction and operation that has not been adequately studied in the Draft EIS.

Methodology

The methodology BIA used to determine trip generation rates at the Event Center requires explanation. According to the Draft EIS (page 4.8-2), events at the proposed conference center are anticipated to begin between 7:00 and 8:00 PM, outside the PM peak hour. Please provide the basis for this assumption as it is customary for conferences to occur during regular business hours. A6-05

Impacted Areas

The Draft EIS focuses on traffic impacts in Redding. There will be impacts within the County that need to be evaluated and addressed, including:

- **Impacts on Commercial Way:** There will be significantly increased traffic on Churn Creek Road that will impede the ability of trucks to enter from Commercial Way. Large trucks cannot turn right onto Churn Creek due to the proximity of the Churn Creek Bridge approach rail. Left-turning traffic onto Churn Creek Road climbs a 10% grade. Short-term impacts may be mitigated with a traffic signal.

- **Impacts at Churn Creek Bridge:** The Project will impact the Churn Creek Road at Churn Creek Bridge in several respects. Interim widening may be necessary to accommodate a left turn lane onto Commercial Way and to facilitate right turn movements from Commercial Way. Churn Creek Road traffic volumes and associated wear-and-tear will eventually necessitate replacement.

- **Impacts on Knighton Road:** The traffic study for the north-and-south access option projected a doubling of traffic on Churn Creek Road south of Smith Road. Project-related impacts to Knighton Road at the Churn Creek Road and Interstate 5 ramp intersections, however, were not evaluated. Potential impacts and their associated costs are not known at this time. A6-06

BIA should prepare a traffic study of these impacts. The study should evaluate:

- The Churn Creek Road/Commercial Way intersection in the analysis for all Strawberry Fields scenarios.
- The north and south access option for Strawberry Fields more than doubles the traffic on Churn Creek Road south of Smith Road.
- The Churn Creek/Knighton Road, and the Knighton Road/I-5 ramps intersections in the traffic analysis for all north and south access options.
- The segment of Churn Creek Road from Knighton Road to Smith Road.
- The segment of Knighton Road from the I-5 ramps to Churn Creek Road.

- Smith Road from the proposed new road to Churn Creek.

A6-06 (Cont.)

Road Maintenance

Apart from upgrade requirements, the proposed project will impact the infrastructure causing road maintenance costs to increase. County road maintenance costs average approximately $10,000 per mile annually (pavement, waste, drainage, striping, signage, liability, etc.). Approximately 8.1 miles of County maintained roads within two miles of the Project will be impacted. Project-related traffic and liability may increase these costs.

A6-07

4. The analysis of the project's impacts on water resources requires additional development.

Surface Water

Strawberry Fields and Anderson Sites: Proposed stormwater retention ponds will be underwater during flood events. Please explain how a submerged pond/basin will reduce the peak stormwater runoff, ensuring that pre- and post-development runoff remains the same.

The Western Shasta Resource Conservation District commissioned the "Churn Creek Bottom Flood Risk Reduction Reconnaissance Study, Shasta County," prepared by Pacific Hydrologic Incorporated, dated March 7, 2019, a copy of which is attached for your information. The intent of this study, which was funded by the FEMA Cooperating Technical Partners Program, is to identify projects that may be beneficial in reducing flood risk in the Churn Creek Bottom area. One of the potential projects identified in the study is the "Flood Bypass to Sacramento River," consisting of the construction of a channel and/or culvert between Churn Creek and the Sacramento River. The channel/culvert alignment considered in the study traverses the Strawberry Fields site in the general location of the proposed casino building (see Figure 26). The County of Shasta is neither in support nor in opposition to any of the specific projects identified in this study; the purpose of this comment is to inform the BIA of the existence of this study. Placing the Strawberry Fields site into trust would preclude the bypass project as a viable flood control project, an effect that should be evaluated in the EIS.

A6-08

Redding Rancheria Casino Master Plan Draft Grading and Drainage Study

Section 4 - Hydrology and Hydraulics – Strawberry Fields Site. Per county standards, this project requires evaluation based on the 25-year storm – the evaluation only considers 2- and 10-year events.

Section 5.4 - "The project has been designed in such a way that the volume of fill placed within the FEMA 100-year floodplain will be mitigated by an equal volume of cut (detention/infiltration basins) within the FEMA 100-year floodplain." Please explain how a detention/infiltration basin located within the 100-year floodplain will reduce the peak stormwater runoff ensuring that pre- and post-development storm drainage remains the same.

5. The analysis of the socioeconomic impacts requires additional development.

Fiscal Effects

The Strawberry Fields site currently generates approximately $41,000 in annual property tax revenue; Shasta County's share of this revenue is approximately $4,300. If this site is placed into trust, this property tax revenue will no longer be generated. If the Strawberry Fields site is developed as intensively as

A6-09

proposed after being placed in trust, despite the impacts this development would have upon County services no property tax revenue would be generated. The impacts of the proposed development upon County services addressed in this letter should be addressed relative to the lack of property tax revenue generated by the property.

Assuming an average occupancy rate of 50 percent and an average nightly room rate of $150, the proposed 250-room hotel would generate approximately $685,000 in transient occupancy tax revenue to the County annually if the property were developed in its current fee title status. However, if the proposed hotel is developed after being placed in trust, despite the impacts the proposed hotel would have upon County services, no transient occupancy tax revenue would be generated. The impacts upon County services addressed in this letter should be addressed relative to the lack of transient occupancy tax revenue generated by the proposed hotel.

A6-09 (Cont.)

The Board of Supervisors adopted the Shasta County Public Facilities Impact Fees program in 2008 to offset the fiscal impacts to County facilities attributable to new development, namely public protection, public health, library, Sheriff patrol and investigation, general government, animal control, fire protection (County Fire Department service area only), and traffic (South County Region only) facilities. If the Strawberry Fields site is placed into federal trust status for the Tribe, development on this site would not be subject to Shasta County impact fees; therefore, the impacts of the proposed development to County facilities would not be offset by the payment of impact fees. The Draft EIS fails to address this fiscal effect to Shasta County.

Housing

The Shasta County Housing Authority is concerned that the proposed development will have an impact on the available housing stock on the valley floor in Shasta County. The Carr Fire and Camp Fire, which occurred subsequent to the preparation of the Draft EIS, have significantly impacted the housing stock in Shasta County by shrinking the number of homes available to rent and purchase, thus increasing the cost of housing in our area. The Carr Fire alone destroyed nearly 1,100 homes in Shasta County and the Camp Fire resulted in a substantial number of Butte County residents relocating to neighboring counties, including Shasta County. The statement regarding housing on pages 4.7-9 and 4.7-10 of the Draft EIS (and any similar statements elsewhere within the document) should be updated to reflect the change in the housing market since the Carr Fire and Camp Fire and the impacts of the proposed development to the local housing market should be reevaluated:

> "…there are anticipated to be more than enough vacant homes to support potential impacts to the regional labor market…"

A6-10

As of May 1, 2019, there were 115 rentals listed on property management websites in Shasta County at $1,200 or less per month and 175 single-family homes listed for sale with a price of $250,000 or less, only 134 of which were located on the valley floor of Shasta County.

Social Effects

The Draft EIS identifies problem and pathological gambling as an impact of the proposed development and includes a mitigation measure requiring the Tribe to implement problem gambling policies similar to those in effect at the existing Win River Casino. However, the Draft EIS fails to consider the impacts of the proposed development to the Shasta County Health and Human Services Agency, who anticipates the need to implement education, prevention, and treatment programs addressing problem gambling and

gambling addiction as well as related impacts, including but not limited to, substance abuse, mental health, elder abuse, domestic violence, and child abuse and neglect. Absent the involvement of the Shasta County Health and Human Services Agency, it is our opinion that the proposed mitigation measure is inadequate. A6-10 (Cont.)

Homelessness

By letter of May 30, 2019, the Tribe's Chief Executive Officer, Tracy Edwards, cited the homelessness problem in Redding and greater Shasta County. She noted that homeless populations continue to set up illegal campsites adjacent to the Rancheria, on tribal and non-tribally owned lands alike, and adversely impact the Tribe's current gaming operation. The Draft EIS does not address the homeless problem in the region or how the proposed development might shift or increase the homeless population in the County. Because homeless populations tend to congregate near development, the proposed project may alter the current homeless demographics. This is an important issue that should be evaluated so that the County and the Tribe can work collaboratively to address this issue. A6-11

6. The Draft EIS should be revised to address air quality impacts.

Environmental Consequences

On page 4.4-1, the Draft EIS states that because the off-site access improvement areas located within the City of Redding and Shasta County and would be subject to City and County approvals, emissions resulting from off-site improvements are compared to Shasta County Air Quality Management District (SCAQMD) emission thresholds. However, an evaluation of the impacts of the proposed development relative to the following SCAQMD emission thresholds* could not be found within the Draft EIS:

Level A: 25 pounds per day of oxides of nitrogen or reactive organic compounds
60 pounds per day of inhalable particulate matter (PM_{10})

Level B: 137 pounds per day of oxides of nitrogen, reactive organic compounds, or inhalable particulate matter (PM_{10})

A6-12

*Source: *Protocol For Review, Land Use Permitting Activities, Procedures for Implementing the California Environmental Quality Act*, Shasta County Air Quality Management District, November 2003.

Shasta County is non-attainment for the State ozone standard, which should be specified in the EIS. Because of this non-attainment status, the generation of ozone precursors associated with the proposed development, including nitrogen oxides and volatile organic compounds, should be evaluated.

The following comments address the proposed Air Quality Construction Best Management Practices contained in Table 2-2:

- Use of Tier 3 and 4 engines should be required for all diesel equipment with a horsepower rating of greater than 50.
- Compliance with District Rule 3:16 - Fugitive Emissions should be required.
- Compliance with District Rule 3:31 - Architectural Coatings should be required.

A6-13

The following comments address the proposed Air Quality Operation Best Management Practices contained in Table 2-2:

- If motor vehicle fueling is proposed, State Regulations for fueling would be applicable.
- Compliance with District Rule 2:1 – New Source Review, Best Available Control Technology should be required.

A6-13 (Cont.)

Please feel free to contact Paul Hellman, Director of Resource Management, at (530) 225-5114 if you would like to discuss our comments.

Respectfully,

Leonard Moty, Chairman
County of Shasta Board of Supervisors

Attachments:

1. Letter from Sheriff Tom Bosenko dated May 22, 2019
2. Letter from Chief Bret Gouvea dated May 31, 2019
3. Letter from District Attorney Stephanie Bridgett dated June 5, 2019
4. *Churn Creek Bottom Flood Risk Reduction Reconnaissance Study, Shasta County*, Pacific Hydrologic Incorporated, March 7, 2019

cc: Larry Lees, County Executive Officer, County of Shasta
Tracy Edwards, Chief Executive Officer, Redding Rancheria
Sheriff Tom Bosenko, County of Shasta
Rubin E. Cruse, Jr., County Counsel, County of Shasta
James Ross, Assistant County Counsel, County of Shasta
Chief Bret Gouvea, CAL FIRE/Shasta County Fire Department
Pat Minturn, Director of Public Works, County of Shasta
Donnell Ewert, Health and Human Services Agency Director, County of Shasta
Paul Hellman, Director of Resource Management, County of Shasta
Terri Howat, Chief Financial Officer, County of Shasta
Laura Burch, Director of Housing & Community Action Programs, County of Shasta
John Waldrop, Air Quality District Manager, County of Shasta

Comment Letter A6

SHASTA COUNTY

Office of the Sheriff

Tom Bosenko
SHERIFF - CORONER

May 22, 2019

Paul Hellman, Director
Department of Resource Management
1855 Placer Street
Redding, CA 96001

Re: Redding Rancheria Draft Environmental Impact Statement

Thank you for the opportunity to review and respond to the *Public Services Impacts and Mitigation Measures* portion of the **Redding Rancheria Draft Environmental Impact Statement** (EIS) pertaining to law enforcement.

The attached document reflects a high level review of the EIS and highlights areas of concern including funding of additional full time patrol deputies as well as funding of associated equipment and infrastructure. Also, due to the proximity of the proposed project to the Sacramento River, there is a potential impact to the Sheriff's Office Boating Safety Unit.

A6-14

Sincerely,

Tom Bosenko

Tom Bosenko
Sheriff-Coroner
County of Shasta

TMB/ckw

Attachment

300 Park Marina Circle - Redding, CA 96001-1679 - Phone (530) 245-6025 - Fax (530) 245-6054

REDDING RANCHERIA
DRAFT ENVIRONMENTAL IMPACT STATEMENT
Shasta County Sheriff's Office Review
Captain Pat Kropholler
May 22, 2019

A review of the Public Services Impacts and Mitigation Measures chapters of the Redding Rancheria Draft Environmental Impact Statement pertaining to Law Enforcement, beginning at Section 4.7.1 and concluding at Section 5.22 has been conducted.

Of the information forwarded to the Sheriff's Office the crime statistics referenced in Section 4.10.5 for the Alternative A Proposal for Law Enforcement refers to analysis in Section 4.7.11 under the heading "Crime" as there being "no definitive link between casinos and crime". That opinion was based off an interpretation of a report issued in 1999 by The National Opinion Research Center (NORC). However, in a 2006 NORC Report, *"California Problem Gambling Prevalence Survey"*, it shows a clear correlation between at-risk and problem gamblers to an increase in mental health issues, use/overuse of alcohol, legal and illicit drugs and emotional or financial impact on families (which often leads to increased domestic disturbance calls). It also indicates that problematic gamblers, who are more likely to have been arrested/incarcerated, impact the criminal justice system. Therefore there is a link between gambling and crime and of the $9.1 billion in estimated gambling losses that occur at casinos in California, 25.2% are attributed to low-risk gamblers, 22.4% to at-risk gamblers and 52.4% to problem gamblers.

A6-14 (Cont.)

Section 4.7.10 "Social Effects" covers similar statistics regarding issues with problematic gamblers, however offering "informational literature or a self-exclusion policy" is likely to have little criminal deterrent or rehabilitative factor for those who fall within the problematic gambler category which appears to account for over half of all gambling losses at casinos in California.

Returning to Section 4.10.5, it further states, "The need for SCSO assistance would likely be required only in situations where a serious threat to life or property is present, or if arrests are necessary". The security staff at the current Win River Casino location, 2100 Redding Rancheria Rd. Redding, operates in an "observe and report" capacity and does not actively engage individuals participating in any type of in-progress criminal activity. From Jan.1, 2017-Oct. 10, 2018 there were 1351 law enforcement incidents generated from the current Win River Casino address. Of those 1351 incidents the Part 1 crimes alone accounted for: 2 rapes, 3 robberies, 33 aggravated assaults, 24 burglaries, and 127 incidents of larceny.

Overall, interpretation of crime analysis is subjective when considering the behaviors of individuals in heightened states of intoxication or in the midst of emotional events, which may result in unruly behavior or physical altercation.

REDDING RANCHERIA
DRAFT ENVIRONMENTAL IMPACT STATEMENT
Shasta County Sheriff's Office Review
Captain Pat Kropholler
May 22, 2019

Additionally, despite the efforts of the current security staff at the existing facility there are still issues with criminal sales of illegal narcotics, petty theft and vehicle burglary. As these and other types of issues have occurred at the current facility, they are expected to continue at the proposed facility as well.

Alternative B, Section 4.10.10 indicates that measures mentioned in both Alternative A and mitigation efforts from Mitigation Measures, Section 5.10.3, would present a "less-than-significant effect to law enforcement services". This Alternative, though the proposed facility is pared down in size, presents the same law enforcement concerns detailed above for Alternative A.

In conclusion, the measures suggested to mitigate impact on Law Enforcement listed in Section 5.10.3, are necessary and appropriate for this project. They are very similar in practice to what is implemented at the current facility. These steps will help with crime reduction but will not lessen the impact on Law Enforcement. The new proposal site, and its proximity to a major interstate, will undoubtedly generate a higher number of casino guests and visitors to the area. It is expected issues that are criminal in nature and that occur at the current facility, will increase as well. Therefore as part of any contractual discussion had with the Shasta County Sheriff's Office, funding for additional full time patrol deputies and associated equipment and infrastructure costs, will need to be considered. This contractual discussion will need to occur prior to the proposed site becoming operational and could be revisited after a year of operation to determine if additional personnel are needed to address any impact not foreseen in the original planning stages.

A6-14
(Cont.)

Lastly, there was no wording noted in any of the Law Enforcement sections addressing the SCSO's original concerns regarding the locations proximity to the Sacramento River and how that may impact the Boating Safety Unit for any potential water rescue issues that could occur. This would also need to be addressed during contractual discussions.

CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION

COOPERATIVE FIRE PROTECTION
Since 1980
SHASTA COUNTY FIRE DEPARTMENT

Bret Gouvea
Chief

May 31, 2019

Paul Hellman, Director
Department of Resource Management
1855 Placer Street 96001

Re: Redding Rancheria Draft Environmental Impact Statement

Thank you for the opportunity to review and respond to the Public Services Impacts and Mitigation Measures of the Redding Rancheria Draft Environmental Impact Statement (EIS) pertaining to Fire Protection and Emergency Services.

After review of the Public Services Impacts and Mitigation Measures chapters, I have several changes in the second paragraph under Operation. Those changes are as follows:

The sentence stating, *However, it is the mutual/automatic aid agreements between federal, state, and local firefighting resources, such as RFD, that allows SCFD to meet its objective of a cost effective approach to sharing resources and providing services per the 2014 Master Plan (SCFD, 2016),* is a County wide statement and is not completely accurate for this geographic location. Cal Fire and Shasta County Fire Department do not have automatic aid agreements for the geographic location of the project site and there is no existing agreement with federal cooperators for the site as well. A6-15

An acceptable sentence would read, *However, it is the mutual aid agreements between state, and local firefighting resources, that allows SCFD to meet its objective of a cost effective approach to sharing resources and providing services per the 2014 Master Plan (SCFD, 2016).*

Aside from the above changes, I do agree with the remainder of the content in the EIS.

Sincerely,

Bret Gouvea
Chief
Shasta County Fire Department

OFFICE OF THE
DISTRICT ATTORNEY
COUNTY OF SHASTA

Stephanie A. Bridgett
District Attorney

Benjamin L. Hanna
Chief Deputy District Attorney

June 5, 2019

Paul Hellman, Director
Department of Resource Management
1855 Placer Street
Redding, CA 96001

Re: Redding Rancheria Draft Environmental Impact Statement

Mr. Hellman:

I appreciate the opportunity to review and respond to the portion of the Redding Rancheria Draft Environmental Impact Statement as it pertains to public safety and law enforcement. Based on my review of the draft EIS, I have concerns that the document does not adequately reflect the public safety impact that the proposed project will have on the District Attorney's Office.

The District Attorney's Office is the only county department that will absorb the full impact of crimes related to the casino and its operation, regardless of whether those crimes occur on or off of the casino property. Historically, crimes that this office has dealt with relating to existing casino operations have include thefts of property and vehicles, vandalism, assaults, narcotics-related crimes (usage, possession, and sales), as well as other crimes. Further, the impact related to the casino is not limited to incidents occurring on the property of the casino. Numerous crimes occur while individuals are traveling to and from the property. These crimes include driving under the influence, transportation of drugs and weapons and other offenses that adversely impact the safety of the public.

A6-16

As part of this process, I have looked at the impact of expanded casino operations in other counties. In Amador County, the addition of a second casino which served alcohol and more than doubled the slot machines and gaming tables resulted in a significant impact to that county's district attorney's office. In 2018, Amador County DA filed 398 casino related cases. This represented an increase from the 2007 number of 268 casino related cases prior to the construction of the second casino. I would therefore expect that the proposed expansion by the Redding Rancheria to a casino containing over 1200 gaming devices and tables, in addition to alcohol and a convention center, would create an increased impact to this office.

This office has the responsibility to review, file, and prosecute all crimes occurring in Shasta County regardless of the law enforcement agency that initiates the investigation. Therefore, any impact created by the proposed expansion will, without a doubt effect the operations of this office. Beyond criminal prosecution, the impacts will be felt by our Bureau of Investigations which is responsible for investigating crimes in support of the DA mission. Additionally, our Crime Victim Assistance Center would be required to provide services to any victims of crimes associated with the casino.

A6-16 (Cont.)

I am hopeful that by the inclusion of these comments the impact of this project on this office will be represented in the final version of the EIS. Feel free to contact me with any questions or concerns.

Sincerely,



Stephanie A. Bridgett
District Attorney

Comment Letter A6

Churn Creek Bottom Flood Risk Reduction Reconnaissance Study

Shasta County

Prepared for:

Western Shasta Resource Conservation District
6270 Parallel Road
Anderson, CA 96007

Prepared by:

Pacific Hydrologic Incorporated
1062 Market Street
Redding, CA 96001



Norman S. Braithwaite

March 7, 2019

Churn Creek Bottom Flood Risk Reduction Reconnaissance Study

Introduction:

The reach of Churn Creek from the mouth to Churn Creek Road (between South Bonnyview Road and Rancho Road), locally known as Churn Creek Bottom, is subject to flooding on a relatively frequent basis. The Western Shasta Resource Conservation District (RCD) has assisted flood prone property owners to reduce flood risk by removing invasive vegetation in and adjacent to the Churn Creek channel thus increasing the flood carrying capacity of the channel. Although this project has reduced flood risk to some degree, the level of flood risk is still high and the RCD believes additional projects including further vegetation management and physical modifications may be of benefit in reducing flood risk to an acceptable level. Figure 1 identifies the study area on the current effective FEMA Flood Insurance Rate Map (FIRM). This study has been funded by the FEMA Cooperating Technical Partners (CTP) Program, contract EMF-2017-CA-00009.

Above Churn Creek Bottom, Churn Creek drains a basin of 33.4-square miles ranging in elevation from approximately 460-feet at the upper end of Churn Creek Bottom to over 2000-feet on hills adjacent to Shasta Lake. Mean annual precipitation in the basin is reported to be 48-inches by the USGS. Land use in the basin consists mostly of urban development in the City of Redding and Shasta Lake City with some rural residential and undeveloped lands outside of the cities and on steep ground in the headwaters. City of Redding design standards have prevented development during the past 25-years from increasing the peak flow in Churn Creek, a standard more stringent than the "rule of reasonableness" establishing the standard of care for development in California. Vegetation in undeveloped areas consists primarily of chaparral. Many flood studies have been conducted within the Churn Creek basin in support of specific developments and for planning purposes. Two of these studies, the FEMA Flood Insurance Study (FIS) and the City of Redding City-Wide Master Storm Drain Study, address the entire basin and are of significance to the current study.

A6-17

Within Churn Creek Bottom, Churn Creek has a well defined meandering channel that is generally choked with non-native vegetation except where vegetation is being managed. A vegetation management program has been established for the Churn Creek channel from a point approximately ½-mile downstream of the middle Churn Creek Road crossing (near Green Acres Drive) to the north Churn Creek Road crossing (off South Bonnyview) after several flood events inundated farm land and structures in the vicinity of Green Acres Drive. Downstream of Meadowview Drive, the 100-year flood peak flow is generally contained within the active, vegetation choked channel. This reach of channel has incised since construction of Shasta Dam due to water surface elevations in the Sacramento River being maintained at artificially low elevations during times of high flow in Churn Creek. Knowledge of channel changes since the survey supporting the FEMA FIS including upstream propagation of incision and potential sedimentation (aggradation) in the upper reaches of Churn Creek within Churn Creek Bottom are of interest and have been addressed in this study.

Since the ultimate goal of this project is to reduce flood risk and revise the published FEMA FIS and FIRM, this study has been prepared consistent with FEMA requirements for map revisions. The

FEMA process generally consists of obtaining the original FEMA backwater model data set (current effective backwater model), rerunning the model data set in the current version of the original model program (duplicate effective backwater model) including recalibration to match the published FEMA 100-year flood (base flood) profile if necessary, and updating data to represent current conditions (corrected or current condition backwater model). The current effective FEMA FIS and FIRM were developed based upon a US Army Corps of Engineers' HEC-RAS linear steady state backwater model. A two dimensional (2D) dynamic backwater model is required for this study. Therefore, as part of this study, a linear steady state duplicate effective backwater model was prepared before converting to a dynamic 2D model and rerunning to produce a dynamic 2D duplicate effective backwater model. Subsequent to preparation of the duplicate effective backwater models and prior to evaluation of alternatives, data in the dynamic 2D duplicate effective backwater model data was modified to represent the current condition.

After completion of the current condition 2D backwater model, candidate flood risk reduction alternatives identified below were developed and in some cases evaluated using the dynamic 2D backwater model. These alternatives are described in greater detail later in this report.

- Extend vegetation management downstream to the mouth of Churn Creek
- Develop off-channel detention at a location upstream of Churn Creek Bottom
- Construct a flood relief channel conveying Churn Creek flood flow to the Sacramento River
- Construct a flood relief channel paralleling Churn Creek
- Construct a channel conveyance improvement (widen Churn Creek channel)

Other candidate alternatives including removal of a berm encroaching within the 100-year floodplain upstream of Knighton Road and construction of set back levees have not been evaluated in this analysis. Based on the results of the vegetation management alternative, no significant reduction in flood risk is believed to be associated with removal of the berm. The set back levee alternative was eliminated due to high costs associated with procurement of easements through private property and the fact that this alternative will increase flood risk downstream of the levees.

A6-17
(Cont.)

Flood Hydrologic Analysis:

Flooding in Churn Creek Bottom occurs as a result of large storm events, primarily cloudburst or nested cloudburst events now referred to as stationary convergence events, over the Churn Creek drainage basin. Developed in support of the City-Wide Master Storm Drain Study of 1993, the City of Redding maintains a rainfall-runoff model on the Corps of Engineers' HEC-1 platform that is up to date and sufficient for evaluation of existing conditions in Churn Creek Bottom. A cursory review of flood hydrology in Churn Creek indicates that the FEMA FIS has relied upon the City of Redding rainfall-runoff model and that rainfall-runoff model results are consistent with the 100-year flood peak flow estimate by the USGS Streamstats web application (regional methodology) when considering the presence of urban development within the basin. All backwater model runs therefore relied on the FEMA published peak flows with the unsteady duplicate effective backwater models employing hypothetical partial flood hydrographs consisting of flow ramping up to the published FEMA 100-year flood flows over a period of 20-hours followed by constant flow at the published FEMA values over a period of 10-hours thus simulating steady state peak flow. Flood peak flows relied upon by FEMA for the Churn Creek FIS do not account for

loss of flow from the channel due to overflow leaving the Churn Creek basin over Interstate 5 or for attenuation of peak flow by storage of flood water in the floodplain.

The upstream boundary conditions for the current condition model runs consisted of 100-year flood hydrographs from the City of Redding rainfall-runoff model scaled to have the peak flows match the published FEMA 100-year flood flows. Loss of flood water from the basin and storage of flood water within the overbank floodplains are accounted for by the 2D backwater model. As such the peak flow in the Churn Creek channel is attenuated in the downstream direction by the 2D model. Simulated steady state and dynamic flood hydrographs for the upstream model boundary conditions are shown on Figures 2 and 3. The flood frequency relationship for Churn Creek at the upstream backwater model boundary (COR rainfall-runoff model "C1898" above Linden Drain) is identified in Figure 4.

Duplicate Effective Backwater Models:

Two duplicate effective backwater models were prepared for this study, one being a linear steady state backwater model (Duplicate Corrected) and the other being a linear dynamic backwater model (Duplicate Unsteady) in preparation of adding 2D domains representing shallow overbank flood flow. Unfortunately, simply re-running the current effective backwater model data set did not produce a flood profile meeting the FEMA standard for a duplicate effective backwater model (Duplicate Received). The reasons for substantial differences in 100-year flood profiles may be due to changes in HEC-RAS computational routines or more likely, the actual data set relied upon for preparation of the FIS was not submitted and saved by FEMA. Substantial differences in flood profiles were found at and upstream of bridges. Reasonable modifications of the Current Effective data set were therefore employed as necessary to produce the linear steady state Duplicate Corrected backwater model. Changes to the original data set included the following:

A6-17
(Cont.)

- Meadowview Bridge – Convert computation method from pressure & weir to energy
  Change pier widths from 4.0-feet to 4.2-feet
- Middle Bridge – Convert computation method from pressure & weir to energy
- X-sec 25968 – Define ineffective area in left overbank
- X-sec 25968 – Define ineffective area in left overbank
- X-sec 25984 – Revise encroachment limits

A comparison of the Current Effective, Duplicate Received, and Duplicate Corrected flood profiles is presented on Figures 5 and 6.

In preparation of converting the model to employ overbank flow computations within two dimensional (2D) domains, a dynamic duplicate effective (Duplicate Unsteady) backwater model was prepared by employing the following steps:

- Add horizontal coordinates for cross-section points to produce a georeferenced duplicate backwater model (Duplicate Georeferenced). Locations of georeferenced cross-sections are shown on Figure 7.

- Replace steady state flow data with flow hydrographs and run the model in dynamic mode (Duplicate Unsteady)

A comparison of the Current Effective and Duplicate Unsteady flood profiles is presented in Figure 8. Some further adjustment of the duplicate unsteady model will be required prior to any FEMA map revision due to differences in water surface elevations exceeding 0.5-feet at one location.

Channel Morphology:

As a result of controlled flows in the Sacramento River during times of local flooding, the Churn Creek channel has incised from the mouth to near Meadowview Drive. According to residents in the vicinity of Green Acres Drive, sediment accumulation was observed in the channel prior to implementation of the vegetation management program. Given these recognized and potentially continuing processes, a backwater model run was prepared to identify the significance of continuing geomorphic processes. This model run was developed by replacing channel data in a copy of the Duplicate Georeferenced model employing the FEMA data set (2004±) with new field surveyed channel data collected at the FEMA cross-section locations. No other data from the Duplicate Georeferenced model was modified so as not to contaminate the ability of the Morphology Check model results. Both model runs were linear steady state runs. Data and results of the Morphology Check model were compared to the duplicate effective model run to determine the magnitude and significance of changes to the channel since the FEMA survey. A comparison of flood profiles from the Morphology Check and Duplicate Georeferenced backwater models is presented in Figure 9. Comparisons of channel geometry at cross-sections selected to have a spacing of approximately 5000-feet are shown on Figures 10 through 15. If the geometry of Churn Creek has experienced substantial changes since the FEMA survey, the trend would be reflected by an increase or decrease in the 100-year flood profile over a number of cross-sections. Both the flood profiles and the selected cross-sections tend to support an argument that the channel has not experienced significant geomorphic changes since the FEMA cross-section survey. Any sediment which may have accumulated in the reach of Churn Creek near Green Acres Drive prior to implementing the vegetation management program has since been conveyed downstream.

A6-17 (Cont.)

Current Condition Backwater Model:

After completion of the duplicate effective models and morphology check, two current condition backwater models were prepared by adding 2D domains east and west of the Churn Creek channel, revising top of bank stations, revising channel roughness coefficients, adding the Knighton Road bridge (not in FEMA current effective model), and adding internal and external boundary conditions to the 2D domains (Current 2D). Top of bank stations were moved to reflect the active portion of the Churn Creek channel rather than the flood channel. Adjacent to the 2D flow domains, overbank areas were defined as ineffective flow areas on the linear domain cross-sections to prevent the backwater model from double accounting for flow in the overbank areas. Channel roughness coefficients employed in the current condition backwater model were based on field observations of factors contributing to overall channel roughness and ranged from 0.035 to 0.050. Roughness coefficients within the 2D domains were based on 2011 National Land Cover Database (2011 NCLD) using roughness coefficients suggested in the HEC-RAS v5 2D Modeling User's Manual. External boundary conditions were established between Interstate 5 (I-5) and the Sacramento River

at two locations where overflow in the west 2D domain overflow during the most probable 100-year flood will to overtop I-5. The normal depth method with a hydraulic slope of 0.005 was used for all external boundary conditions. Internal boundary conditions were defined for the crowns of Smith Road, Knighton Road, and Churn Creek Road north and south of Green Acres Road. The internal boundary conditions were included to prevent the backwater model from indicating flow past these road prisms unless the water surface elevation exceeds the crown elevation. Flow over the road prisms was computed using normal 2D computations rather than weir equations. The Knighton Road bridge was modeled by adding a copy of Cross-section 15593 to the model at a location 400-feet downstream of Cross-section 15593 and adding the bridge geometry data from as-built drawings between the two cross-sections. Unsteady flow contraction and expansion coefficients were set to 0.1 and 0.3 respectively except in the vicinity of bridges where the unsteady flow roughness coefficients of 0.3 and 0.5 respectively were employed. The first current condition backwater model was run using the simulated steady state hydrograph (Current Condition) and the second was run using full flood hydrographs from the City of Redding rainfall-runoff model[1] (COR 100-year).

A comparison of the current condition backwater model profiles to the current effective profile is shown on Figure 16. Differences between the current condition flood profile and the current effective flood profile represent differences in data between the two models including roughness coefficients reflecting channel vegetation, the Knighton Road bridge, and most significantly ground data representing the overbank floodplains. Figure 17 identifies a significant floodplain elevation difference between the FEMA current effective model and the LiDAR terrain data used in the 2D models at cross-section 28903. Similar differences exist at other cross-sections. The COR 100-year profile is below the current condition flood profile due to the limited volume of water represented in the COR flood peak as opposed to an effectively unlimited volume of water available in the simulated steady state flood hydrograph. Peak flow for both dynamic 2D model runs is attenuated by overflow leaving the Churn Creek basin over I-5 and by storage of flood water in the floodplain. A comparison of peak flows along Churn Creek for the current effective, current condition, and COR 100-year model runs is presented in Figure 18. Dips in the peak flow followed by increases in a downstream direction represent flow leaving the channel as overflow then re-entering the channel. The overall decrease in peak flow of the dynamic models represents flow lost from the Churn Creek basin and flood water stored (delayed) in the floodplains. The maximum extents of inundation for the two current condition runs are presented in Figures 19 and 20. The current condition backwater models indicate incipient overflow in the vicinity of Green Acres Drive at a flow of approximately 7000-cfs, a flood estimated to have a statistical recurrence of approximately 10-years.

A6-17 (Cont.)

[1] The lateral inflow hydrograph was scaled such that the magnitude of lateral inflow at the time of peak flow in Churn Creek matched the FEMA steady state inflow.

Vegetation Management:

Management of vegetation is a commonly considered first tier approach for reducing flood risk. A vegetation management program has been established for the Churn Creek channel from a location approximately ½-mile downstream of the middle Churn Creek Road crossing of Churn Creek (near Green Acres Drive) to the upper Churn Creek Road crossing of Churn Creek (near South Bonnyview Road). This vegetation management program has reduced flood risk in the vicinity of Green Acres Drive but the area remains subject to inundation on a relatively frequent basis. From downstream of the reach for which vegetation is being managed to the mouth of Churn Creek, however, the channel is presently choked with vegetation. A backwater model run representing extension of the vegetation management program to the mouth of Churn Creek was prepared (CC2D – Vegetation) by reducing Manning's roughness coefficients in the channel to 0.033 from a range of 0.045 to 0.060 in order to determine the potential flood risk benefit of extending the program to the mouth of Churn Creek. A comparison of the 100-year flood profile for the extended vegetation management program to the current condition 100-year flood profile is shown on Figure 21. The comparison indicates a substantial potential flood risk benefit downstream of the current vegetation management reach but no significant potential flood risk benefit along the current vegetation management reach.

Upstream Off-channel Regional Detention:

Off-channel regional detention consists of a detention basin separated from the Churn Creek channel by a side channel weir and having a small downstream outlet. The weir elevation is set such that flood water only enters the detention basin when flow in the channel exceeds a design threshold. The small downstream outlet drains keeps the detention basin from ponding water prior to the flood (local runoff) and to drain the detention basin after the flood. This type of detention basin will truncate the flood peaks exceeding the design threshold and is therefore much more efficient than conventional on channel detention facilities. The size of the detention basin is determined from the available hydraulic head between the upstream design threshold water surface elevation and the downstream low flow (1-year flood ±) water surface elevation and from the volume of flood water in excess of the design threshold during the flood peak. The length of the side channel weir is determined by the peak flow to be diverted and the difference in water surface elevation between the threshold flood profile and the maximum water surface profile. Off-channel detention facilities can be designed as multiple use facilities hence they can accommodate parks, community gardens, environmental mitigations, and other uses that are not sensitive to inundation.

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(Cont.)

This study took the approach of determining the volume of detention available in the area of low intensity land use between the Churn Creek channel and Kids Kingdom Park then estimating how much this volume may attenuate the Churn Creek flood peak. The available hydraulic head was determined to be approximately 11 feet between cross-sections 39790 and 38790 near the up and downstream ends of the candidate detention basin area. Without substantially encroaching in the area required by Churn Creek to convey flood flows, the surface area available for the detention basin was estimated to be approximately 15 acres. The useable volume of an off-channel detention facility at this location is therefore approximately 190 acre feet. This volume is sufficient to truncate the 100-year flood hydrograph upstream of Churn Creek Bottom from

12,700-cfs to 11,000-cfs. The length of the side channel weir is estimated to be 1750-feet based on a need to divert 1700-cfs and an elevation difference of 0.45-feet between the maximum water surface profile and the 11000-cfs water surface profile. The low intensity land use area on the opposite side of the Churn Creek channel downstream of the site adjacent to Kids Kingdom Park has a similar potential for attenuation of the flood peak. If developing both sites as off-channel regional detention, the combined volume available will be approximately 350 acre feet sufficient to attenuate the 100-year flood hydrograph upstream of Churn Creek Bottom from 12,600-cfs to 10,300-cfs. Figures 22 through 24 identify the areas available for potential off-channel regional detention, the available hydraulic head, and the City of Redding Churn Creek 100-year flood hydrograph with potential attenuation identified. The estimated potential benefit of the off-channel regional detention options at cross-section 32960 located downstream of the upper Churn Creek Road crossing of Churn Creek (near South Bonnyview) is identified on Figure 25 (includes local lateral inflow).

Flood Bypass to Sacramento River:

At their closest point upstream of Green Acres Drive, the Churn Creek channel is within 1600-feet of the Sacramento River channel. Diversion of flow from Churn Creek in excess of the incipient overflow near Green Acres Drive (approximately 7000-cfs) to the Sacramento River can be an effective approach to reduce flood risk in Churn Creek. The added flow to the Sacramento River will not increase flood risk along the Sacramento River because flow in the Sacramento River is reduced at times of high flow in the tributaries entering the river below Shasta Dam. Diversion of the Churn Creek flood peak to the Sacramento River will require construction of a side channel weir entrance structure, 2100-feet of channel or culvert including crossings at the ACID canal and I-5, and some type of outlet structure or erosion protection. The entrance structure will require approximately 250-feet of side channel weir with a top elevation approximately 3.5-feet below the 100-year flood profile and taper to the channel or culvert entrance width. The alignment considered for this analysis is identified on Figure 26.

A6-17 (Cont.)

If an open channel is to be considered for the bypass, the channel will consist of two segments, one of approximately 700-feet from the Churn Creek channel through I-5 with a slope of 0.013 and the other of 1400-feet from the west side of I-5 to the Sacramento River with a slope of 0.0017. The upper segment will consist of a non-prismatic section having a 250-foot wide by 3.5-foot deep side channel weir entrance transitioning to a 70-foot wide by 5-foot deep downstream section. The narrow end of the upper segment will be under Interstate-5. The lower segment will consist of an 80-foot wide by 5-foot deep prismatic channel. Flow in the open channel will be supercritical for the entire length with velocities reaching 18-feet per second in the narrow portion of the upper segment and averaging 13-feet per second in the lower segment. Freeboard has not been included in the channel depths reported above.

If a culvert structure is to be considered for the bypass, an entrance structure consisting of a side channel weir having a top elevation approximately 3.5-feet below the 100-year flood profile and a length of approximately 250-feet will be required. The entrance structure will taper to the width and depth of the culvert entrance at a distance approximately 100-feet downstream of the side channel weir. The culverts should have a hydraulically efficient entrance, be placed under the ACID canal (or pipe), and have a uniform slope to the Sacramento River. The slope of

culverts having this configuration will be approximately 0.002 and velocities will range from 6- to 10-feet per second. The average hydraulic slope will be approximately 0.005. Three 6' x 20' barrels or fourteen 6' diameter pipes will be required to convey the 5000-cfs flood peak between Churn Creek and the Sacramento River. Flow in the box culverts will be supercritical.

Flood Relief Channel Parallel to Churn Creek:

Unlike a flood relief channel from Churn Creek to the Sacramento River, a flood relief channel parallel to Churn Creek must be designed prismatic with a slope equal to the slope of the floodplain. The alignment of the candidate flood relief channel considered for this analysis is shown on Figure 27. Based on Manning's Equation, the width of the upper segment (solid line) of channel sufficient to convey the 5000-cfs difference between the 100-year peak flow in the Churn Creek channel and the incipient overtopping flow are identified for a variety of depths and boundary materials in Table 4.

Table 4: Churn Creek to Churn Creek Flood Relief Channel Geometry, Prismatic Channel

Segment	Slope	Manning's n	Depth[1] (feet)	Width (feet)
Segment 1, concrete, 4' deep	0.0019	0.011	4	89.1
Segment 1, concrete, 5' deep	0.0019	0.011	5	63.9
Segment 1, concrete, 6' deep	0.0019	0.011	6	49.4
Segment 1, earth, clean, 4'	0.0019	0.028	4	219.3
Segment 1, earth, clean, 5'	0.0019	0.028	5	153.9
Segment 1, earth, clean, 6'	0.0019	0.028	6	116.2
Segment 1, earth, reeds, 4'	0.0019	0.04	4	311.1
Segment 1, earth, reeds, 5'	0.0019	0.04	5	217.2
Segment 1, earth, reeds, 6'	0.0019	0.04	6	163.0

Notes: 1) Freeboard not included.

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(Cont.)

The length of the upper segment of channel is approximately 5800-feet. The lower segments, if needed, will require similar dimensions as the upper segment. The lengths of lower segments are approximately 1250-feet for the middle segment and 1400-feet for the lower segment (dashed lines). The side channel weirs at the upstream end of each segment will have the same dimensional requirements as for the diversion from Churn Creek to the Sacramento River. There may also be requirements at the downstream ends of the flood relief channels to prevent stranding of fish as flood water subsides.

Channel Conveyance Improvement:

Channel conveyance improvements consist of widening the channel to accommodate greater flow thus reducing the frequency and magnitude of overflow. Geomorphic considerations dictate that the conveyance improvement not deepen the channel and environmental considerations dictate that the widening be above the water surface elevation of some threshold flow. The edge of perennial vegetation should be considered a lower limit of the elevation of a conveyance improvement. Vegetation in any reach of channel having a channel conveyance improvement will need to be managed in order for the conveyance improvement to remain

efficient. This study has evaluated the potential requirements and flood risk benefit of a channel conveyance improvement by adjusting the channel width in a copy of the Current Condition CC2D COR 100-year hydrograph model data set. The width of the channel was increased by various factors between top of bank stations using the adjust stations option in the HEC-RAS cross-section editor. A factor of 1.5 or 50% increase in the width of the Churn Creek channel was found to substantially reduce overflow in the vicinity of Green Acres Drive. Channel widths were adjusted from just downstream of Knighton Road (Cross-section 15273) to a point downstream of the upper Churn Creek Road crossing of Churn Creek (Cross-section 32154). Plots of changes in the geometry of selected cross-sections are presented in Figures 28 and 29. Table 5 identifies the changes in channel area associated with the increased channel width. An actual channel conveyance improvement project (constructed widening as opposed to an assumption of a wider channel) will require similar increases in area in order to have similar benefits. A comparison of the 100-year flood profile with the conveyance improvement compared to the Current Condition CC2D COR hydrograph 100-year flood profile is presented on Figure 30. The maximum extent of inundation for the channel conveyance improvement run is presented in Figure 30.

Table 5: Conveyance Improvement, Increases in Channel Areas

Cross-section	Area (sq ft)	Cross-section	Area (sq ft)
32154	327	25894	568
31138	572	25563	490
30189	359	24129	318
28903	369	22273	468
28345	383	19481	533
26626	490	18480	451
26004	378	18250	481
25968	359	15593	851
25924	536	15273	845

A6-17
(Cont.)

Summary of Results:

Changes to the Churn Creek channel since publication of the current effective FEMA FIS and FIRM have not been great enough to affect a significant change to flood risk in Churn Creek Bottom. Evaluation of flood risk for current conditions considering dynamic flow and loss of flood water from the basin using a 2D modeling platform indicates flood risk in the lower reaches of Churn Creek within Churn Creek Bottom to be as represented by the FEMA FIS and FIRM but indicates flood risk in the vicinity of Green Acres Drive to be greater than represented by the FEMA FIS and FIRM. The higher flood risk for current conditions is due to mischaracterization of floodplain ground elevations as being lower than actual in the backwater model relied upon by FEMA for the current effective FIS and FIRM.

Of the flood risk reduction alternatives investigated, only diversion of peak flows in Churn Creek directly to the Sacramento River is likely to be capable of addressing flood risk concerns in the vicinity of Green Acres Drive on its own. Other alternatives may be used in combinations

to achieve the same goal. Descriptions of the potential flood risk benefit of each alternative along with additional considerations for each alternative are described below.

Vegetation Management: Extension of the vegetation management program for the Churn Creek channel down to the mouth of Churn Creek was found to provide no direct flood risk benefit in the vicinity of Green Acres Drive. However, implementation of this alternative may be necessary to prevent any increase in flood risk from near Knighton Road to the mouth of Churn Creek associated with implementation of other alternatives including the Churn Creek to Churn Creek flood relief channel and the channel conveyance improvement. Both of these alternatives will increase the peak flow in Churn Creek at their downstream end by eliminating flood water from leaving the basin over I-5 and by reducing storage of flood water on the floodplain. If a vegetation management program is to be relied upon for reduction in flood risk recognized by FEMA, the program must be administered or overseen by a public agency and the land subject to management must be in a vegetation management easement.

Upstream Off-Channel Detention: Although off-channel regional detention is efficient, the area necessary for a detention basin volume sufficient to address the flood risk concerns in the vicinity of Green Acres Drive is not available. A reasonable assumption of the maximum area available to implement an off-channel regional detention basin is only sufficient to reduce peak flows in Churn Creek to approximately 10,000-cfs. Incipient overtopping in the vicinity of Green Acres Drive occurs when flow in the Churn Creek channel exceeds approximately 7000-cfs. The reduction in Churn Creek peak flow associated with implementing off-channel detention results in a reduction in flood water leaving the basin over I-5 and a reduction in east overbank flow circumventing the Green Acres Drive area rather than reducing peak flows near Green Acres Drive. Off-channel detention may be used to reduce the size of flood relief channels or channel conveyance improvements. If off-channel detention is to be considered, the facility must be under the ownership and jurisdiction of a local agency. Design and knowledge of the actual flood risk benefit of off-channel detention facilities will require preparation of a backwater model with extra attention to detail in the vicinity of the proposed facility. The potential benefits of off-channel detention reported here are only rough estimates.

A6-17 (Cont.)

Flood Relief Channel to Sacramento River: By design, a flood relief channel conveying Churn Creek flows in excess of the incipient overtopping flow of approximately 7000-cfs near Green Acres Drive will be capable of addressing the flood risk concerns in the vicinity of Green Acres Drive without requiring other candidate alternatives. The reduction in flood risk will extend downstream to the mouth of Churn Creek. In addition to the physical requirements of a diversion channel, challenges with this alternative include environmental concerns along both channels, crossings of the ACID canal and I-5, and property ownership. A reduced capacity flood relief channel may be used in conjunction with other alternatives to address the flood risk concerns in the vicinity of Green Acres Drive.

Flood Relief Channel Parallel to Churn Creek: Also by design, a flood relief channel conveying Churn Creek flows in excess of the incipient overtopping flow around the vicinity of Green Acres Drive can be capable of addressing the flood risk concerns in the vicinity of Green Acres Drive. In addition to eliminating overflow in the vicinity of Green Acres Drive, the water surface elevations upstream in Churn Creek will be reduced enough to prevent flood flow from

leaving the basin over I-5 and to prevent overflow in the east floodplain. Consequently, the incidental flood risk benefit associated with loss of flow from the Churn Creek basin over I-5 and storage of flood water in the floodplain under current conditions will be eliminated resulting in higher 100-year peak flows in the Churn Creek channel downstream of the parallel flood relief channel project. Residential structures near Meadowview Drive that are in the 100-year floodplain and already subject to relatively frequent flooding will be at higher risk of flood damage if implementing the parallel flood relief channel project without mitigating the increased downstream flood risk. The vegetation management alternative might be sufficient to mitigate increased downstream flood risk associated with implementing the parallel flood relief alternative.

Channel Conveyance Improvement: Construction of a channel conveyance improvement consisting of widening the channel above an environmental threshold elevation can provide a significant reduction of overflow in the vicinity of Green Acres Drive but may not entirely eliminate overflow due to environmental and practical considerations. The potential flood risk benefit of a channel conveyance improvement was estimated by increasing the existing channel width and hence channel area by 50%. Considering the environmental requirement of staying above a threshold elevation such as may be defined by the edge of perennial vegetation, the actual width of a conveyance improvement representing a 50% increase in total channel area will be approximately equal to the existing channel width (100% increase in channel width). At this increase in width, it may be prudent to construct the conveyance improvement on both sides of the active channel. The existing middle Churn Creek Road bridge over Churn Creek (near Green Acres Drive) will have to be replaced with an appropriately longer bridge. Combined with other alternatives the conveyance improvement alternative may be sufficient to address the flood risk concerns near Green Acres Drive. Like the parallel flood relief channel alternative, the channel conveyance improvement alternative will prevent flood water from leaving the basin over I-5 and will prevent overflow in the east floodplain thus increasing peak flow in the Churn Creek channel downstream of the project. The increased flood risk associated with the increased peak flow downstream might be mitigated by implementing the vegetation management alternative.

A6-17 (Cont.)

Conclusions:

A combination of flood risk reduction alternatives may be the best approach to address the flood risk concerns in the vicinity of Green Acres Drive. Physical details identified by this analysis for the alternatives may be used for preliminary cost estimates necessary to further refine definition of candidate projects to meet the project objectives.

Recommendations:

Results of this analysis may be used to develop preliminary cost estimates of alternatives and combinations of alternatives however confident knowledge of the potential flood risk benefits and design details of the alternatives and combinations of alternatives will require additional backwater model runs representing the specific projects.

With regard to any future FEMA map revision, the linear backwater model runs prepared for this study are substantially sufficient to meet the FEMA requirements for a map revision. Prior to relying on the dynamic backwater model runs, the following will need to be addressed:

1. FEMA should be consulted regarding changing the modeling platform and flood hydrologic analysis.
2. Lateral inflow hydrographs need to be revised. The backwater model relied upon for the current effective FEMA FIS and FIRM included only one lateral inflow representing all contributing flow downstream of the upstream boundary condition. This was preserved for all linear model runs used in this study and was replaced with only two lateral inflow hydrographs for the dynamic (City of Redding hydrographs) model runs.
3. FEMA should be consulted regarding redefinition of the designated floodway. At present, although theoretically possible, computation of a designated floodway cannot always be accomplished using a 2D backwater model.

A6-17 (Cont.)

The concept of a bypass conveying flood flow in Churn Creek to the Sacramento River has been considered for many years. More recently, the possibility of commercial development of the parcel located between I-5 and the Sacramento River has been discussed. Development of the parcel without regard to flood risk concerns along Churn Creek will likely eliminate any opportunity to develop what may be the most cost effective approach to reducing flood risk along Churn Creek to an acceptable level. Negotiation with potential developers of the property may be prudent to preserve opportunity to reduce flood losses or possibly to develop the Sacramento River bypass option.

SHASTA REGIONAL TRANSPORTATION AGENCY

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Daniel S. Little, AICP, Executive Director

June 17, 2019

Mr. Chad Broussard
Bureau of Indian Affairs (BIA)
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

Subject: Comments Regarding the Redding Rancheria Fee to Trust and Casino Project DEIS

Mr. Broussard:

The Shasta Regional Transportation Agency (SRTA) appreciates the opportunity to comment on the Redding Rancheria Fee to Trust and Casino Project Draft Environmental Impact Statement (DEIS).

SRTA's mission is to "maximize state, federal and other revenues for cost-effective transportation investment strategies that connect communities, people and goods." To help us meet that mission, SRTA is guided by the goals, objectives and strategies identified in our Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The RTP/SCS provides a 20-year vision of transportation improvements for the region, in conjunction with local land use, housing, and economic policies and goals. A7-01

The DEIS states that the Shasta County Regional Travel Demand Model was used for the analysis of transportation impacts of the project. However, it is not evident in the text of the DEIS, either in Sections 4.8 or 4.15 of the DEIS or in Appendix F, which version of the travel demand model was used to develop the transportation forecast estimates. Please update the DEIS to indicate which version of the model was used. A7-02

The DEIS references the 2010 Shasta County Bike Plan. A more recent regional active transportation plan was prepared in 2018, the GoShasta Regional Active Transportation Plan (available here: https://www.srta.ca.gov/286/GoShasta). Please update the DEIS to include the GoShasta Regional Active Transportation Plan. A7-03

If you have any questions regarding our comments please contact Associate Transportation Planner Julie McFall at (530) 262-6188 or jmcfall@srta.ca.gov.

Regards,

FOR Daniel S. Little, AICP, Executive Director

Comment Letter A8

STATE OF CALIFORNIA - CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

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Making Conservation a California Way of Life

June 17, 2019

IGR/CEQA Review
Sha-5-12.15
Redding Rancheria Fee to Trust
and Casino Project DEIS
SCH #2016114004

Mr. Chad Broussard
Bureau of Indian Affairs (BIA)
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

Dear Mr. Broussard:

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS) for the Redding Rancheria Fee to Trust and Casino Project. The proposal is to acquire approximately 232 acres from fee land into trust on which the Redding Rancheria proposes to develop a casino resort. The facilities would include an approximately 69,541-square foot (sf) casino, 250-room hotel, conference and event centers, restaurants, retail facilities, parking, and other supporting facilities. The project is southwest of the South Bonnyview/Churn Creek Road/Interstate 5 (I-5) interchange accessed through the City of Redding and located in unincorporated Shasta County.

The current and future needs of the transportation system and the affected I-5 freeway interchange are addressed in the "Bonnyview Interchange (Exit 675) Improvements Project Study Report – Project Development Support" (PSR-PDS Preferred Alternative 4B) prepared by Caltrans for the City of Redding. The traffic evaluations were prepared by Omni-Means/GHD. The study was completed in October 2017. All future improvements to the interchange must be consistent with the study unless demonstrated to be equivalent or superior to the study results.

A8-01

Caltrans reviewed the DEIS and transportation study (TIS). We also reviewed the TIS prepared in 2017. Our comments and concerns are included as Attachment "A."

Caltrans recognizes the unique sovereign status of the Redding Rancheria and is committed to strengthening the Government-to-Government relationship with the Redding Rancheria. If you have any questions, please call me at (530) 225-3369 or email at marcelino.gonzalez@dot.ca.gov.

Sincerely,

MARCELINO GONZALEZ
Local Development Review
Office of Community Planning
District 2

Redding Rancheria Fee to Trust and Casino Project DEIS
SCH #2016114004

ATTACHMENT A
Redding Rancheria Fee to Trust and Casino Project DEIS

DEIS:

Section 3.8 - Existing (2016) Conditions - This section should include the following projects that were known in 2016 and are currently under construction:

- Redding Area Six Lane (RASL) project to widen I-5 to 6-lanes currently under construction, completion expected in 2022.
- Northbound onramp widening at the Bonnyview interchange is currently under construction, will provide dual left turns onto the northbound on ramp from eastbound South Bonnyview, completion expected in 2019.

A8-02

Section 4.8 (p. 4.8.14) Transit, Bicycle, and Pedestrian Facilities – The inclusion of sidewalks and shoulders with adequate widths for bicycles from Bechelli Lane to the facilities will provide employees and patrons with the ability to make transportation mode choices to reduce air quality, greenhouse gas, and vehicle miles travelled (VMT) impacts. The Rancheria should also continue to work with the transit agency to extend bus stops in proximity to the facilities for similar reductions in impacts.

A8-03

Section 4.8 Trip Generation

- 1500 seat amphitheater trip generation is not included and it is not shown on the site plans. The project description in the TIS also excludes the 1,500 seat amphitheater identified in the DEIS. A separate analysis of the proposed days of the week and hours should be prepared to address impacts to the interchange and street network. The frequency of events and whether any other onsite events occur concurrently should be disclosed.
- 1800 seat Event Center trip generation assumes 70% already there and 30% new trips. Trip generation should use an origin-destinations study using wifi data or cell phone data as mentioned other places in the report to support this assumption.

A8-04

- If 2025 is opening day a 20-year projection using 2045 should be included.

A8-05

- The Bonnyview PSR-PDS estimated the casino project traffic prior to knowing the actual scope of the Strawberry Fields site – for the most part the numbers are very similar. However, at intersection #3 the Bonnyview PSR-PDS used 464 trips into the project site from westbound S. Bonnyview compared to the DEIS value of 507 for Friday and 653 for Saturday. 507 is 10% higher than the PSR-PDS for Friday while the 653 is 40% higher than the PSR-PDS for Saturday.
Trips into the project site from an eastbound right at intersection #3 – the PSR-PDS used 140 while the DEIS used 136 for Friday and 176 for Saturday.
Trips out of the project site are as follows – the PSR-PDS used 314 for right turn onto S. Bonnyview compared to the DEIS value of 358 for Friday and 383 for Saturday.
358 is 14% more than the PSR-PDS for Friday while the 383 is 22% more than the PSR-PDS.

A8-06

- Split for Distribution with North-South access is not discussed on Figure 21

A8-07

- Saturday peak at intersection #3 is 653 using all access from the North. Study shows on Figure 21 that 37% choosing south access (240) and 63% choosing north access (413). Split seems too high choosing the south access. 37% means all of northbound I-5 (100%) plus all of northbound 273 (100%) will exit at Knighton (Exit 673) then proceed to Churn Creek Road, then to Smith Road.
- For northbound I-5, our judgement is 75% of travelers will exit at Knighton, and 25% will continue on to the Bonnyview interchange (Exit 675).
- For northbound 273, our judgement is 75% will go to northbound I-5, then exit at Knighton, and 25% will continue on 273 and head east on S Bonnyview Road. Previous split of 240 times 75% equals 180 now choosing the south access on Saturday PM. Please adjust the numbers using that assumption.

A8-07 (Cont.)

- The following intersections should be added to the traffic study – for the north + south access alternatives:
  - Knighton Road at SB ramps
  - Knighton Road at NB ramps
  - Knight Road at Churn Creek Road
  - Sunny Hill Road at Bechelli

A8-08

- The site development plan should consider a frontage road on the west side of I-5 connecting from Knighton Road to Bonnyview Road to develop a transportation network by 2045 or sooner.

A8-09

- Chart for Intersection #25 is not correct. #25 throughout the report shows project traffic going the wrong way onto southbound I-5, please correct.

A8-10

- Current site plan shows about 36 spaces for RVs and/or trucks on the north side. The analysis does not account for large trucks and the street network is currently not designed for large trucks. The Bonnyview area (intersections #3, #4, #5, #6, and #7) of the system cannot handle a significant amount of trucks. Any site amenities attracting large trucks must be analyzed and accounted for or it will require a future analysis identifying the changes needed to the transportation system to accommodate large trucks.

A8-11

Construction Access – Large construction trucks and equipment should be routed from Smith Road to reduce congestion in the Bonnyview area during construction.

TIS Comments:

- The updated TIS has revised the study dates to 2025 and 2040 vs the 2017 report's 2020 and 2035. Slight adjustments to traffic volumes resulted.
- California Gold is still listed as a 2040 forecasted development when it is currently under construction. Caltrans guidance for determining fair share cost requires that all existing and approved projects be included in the 2025 (Te) volume. Excluding this volume reduces the fair share percentage.
- TIS Table 16, either the amphitheater volume should be added, or there should be a description explaining why it was not.
- TIS Table 16, note 5 lists the maximum number of attendees/seats as 672 people, this does not correspond with the table.

A8-12

Redding Rancheria Fee to Trust and Casino Project DEIS
SCH #2016114004

- The fair share of most intersections has dramatically changed from 2017. It is suggested that a spreadsheet be included which allows easy cross referencing to check values. Unable to match the calculations (example Intersection #4).
- 9 Synchro outputs are for intersections 3-7 are missing for the 2040 condition.
- The TIS states new signal or roundabout for north/oak (Anderson Alternative), whereas the DEIS states only a signal.

A8-12
(Cont.)

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

June 17, 2019

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

Subject: Review of the Draft Environmental Impact Statement for the Redding Rancheria Fee-to-Trust and Casino Project, Shasta County

Dear Ms. Dutshcke:

The California Department of Fish and Wildlife (Department) received the Draft Environmental Impact Statement (DEIS) dated April 2019, for the above-referenced project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. The Department is the Trustee Agency for the State's fish and wildlife resources and holds those resources in trust by statute for all the people of the State, pursuant to Fish and Game Code sections 711.7(a) and 1802. As such, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants and their habitat.

The Department reviewed the DEIS as well as the attached appendices. The Department appreciates the DEIS discussion of many of our comments and recommendations from our Notice of Intent comment letter dated December 29, 2016. In addition to providing these comments, and in recognition of the inherent Tribal sovereignty of the Redding Rancheria, the Department would welcome direct government-to-government consultation with the Redding Rancheria at its request regarding the Project or any of the issues raised in this letter. The Department is interested in working collaboratively to resolve any concerns regarding this Project.

A9-01

Project Description

The Project as described in the DEIS consists of the following:

- Transfer of seven parcels totaling approximately 232 acres to trust status for gaming purposes
- Subsequent development of the 232 acres into:
  - 69,541-square foot casino
  - 250-room, 119-foot tall nine-story hotel with a gross footprint of approximately 171,287 square feet, building

- 130,000 square foot retail facility
- 52,200 square foot multi-purpose event center
- 10,080 square foot convention center
- 19,800 outdoor amphitheater with 1,500 seats
- 43,820 square feet of administrative/back of house space

A9-01 (Cont.)

General Comments

Mitigation Measure 5.2(A)(6)

The Best Management Practices included under this mitigation measure include re-vegetating disturbed areas following construction activities. A revegetation plan was not provided in the DEIS nor any of the appendices. The Department requests that the revegetation plan be sent out for review to the Department prior to implementation of the Project.

A9-02

Mitigation Measure 5.5(O)

Mitigation Measure 5.5(O) regarding avoiding nesting birds states in part, "*The surveys shall occur no more than 14 days prior to the scheduled onset of construction. If construction is delayed or halted for more than 14 days, another preconstruction survey for nesting bird species shall be conducted.*" The Department recommends seven (7) days instead of 14 to provide more confidence that additional nests were not built after the survey.

A9-03

Mitigation Measure 5.5(P)

Mitigation Measure 5.5(P) states in part, "*If nesting bird species are observed within 500 feet of construction areas during the surveys, appropriate "no construction" buffers shall be established. The size and scale of nesting bird buffers shall be determined by a qualified biologist and shall be dependent upon the species observed and the location of the nest.*" The Department recommends the last sentence be changed to read, "*The size and scale of nesting bird buffers shall be determined by a qualified biologist in* ***consultation with the USFWS and CDFW*** *and shall be dependent upon the species observed and the location of the nest.*"

A9-04

Bank Stabilization

As currently designed, the Department is does not support the bank stabilization project as proposed for the upper portion of the Project, located on the east side of the Sacramento River. This stabilization project will remove a State-Threatened bank swallow colony (see discussion under bank swallow below) as well as

A9-05

potentially impacting listed salmonid species. As stated in the DEIS, winter-run Chinook Salmon (*Oncorhynchus tshawytscha*) (federally and State listed as Endangered) is known to occur in the Sacramento River. A redd study from 2016 conducted by National Oceanic and Atmospheric Administration (NOAA) found winter-run redds adjacent to the area where rock revetment would occur. The Department is concerned the armoring of the riverbank will prevent the natural recruitment of spawning gravel for this species as well as for fall and late fall-run Chinook Salmon. The Department recommends the bank stabilization be designed using biotechnical treatments that maintain the bank swallow habitat as well as protect the instream habitat.

Biotechnical erosion control and stream bank stabilization projects use live native vegetation, or a combination of vegetative and structural materials (a 'hybrid' solution) to protect streambanks. Biotechnical solutions protect streambanks in three ways: (1) the physical presence of the vegetation cover adds roughness to the bank, reducing near-bank flow velocities and decreasing erosion by fluvial entrainment; (2) the structural strength of the vegetation root wad acts to bind the bank materials together to safeguard against bank failure; and (3) the water uptake of the plant during growth acts to drain the bank and reduce the occurrence of bank saturation, reducing vulnerability to failure. Biotechnical methods are an alternative to conventional erosion control methods (e.g., riprap, gabions) and aim to provide effective streambank stabilization while minimizing damage and disruption to instream and terrestrial habitats. The Department highly recommends the use of biotechnical treatments whenever feasible.

A9-05 (Cont.)

Cumulative Effects Analysis

The DEIS analysis of wildlife corridors was insufficient to determine no significant adverse cumulative effects would occur. The Department recommends analyzing wildlife movement by conducting a simple study which could include setting up trail cameras and tracking stations during five consecutive days during the fall, winter, spring and summer seasons to determine the wildlife use of the Project area. Significance should be determined following the completion of the wildlife study.

A9-06

Special Status Wildlife Species

Bank swallow (*Riparia riparia*)

The Department appreciates the development of mitigation measures and/or best management practices for the bank swallow, a State-listed Threatened species. However, there was no discussion of impacts to bank swallow and its habitat from the proposed bank stabilization project. The goal of bank stabilization is to eliminate or

A9-07

severely reduce the natural erosion processes occurring along the Sacramento River. Stabilization projects reduce the amount of available nesting habitat to bank swallows along with altering sediment transport and deposition, vegetation regeneration, and other natural river processes. A bank swallow colony currently exists along the east side of the Sacramento River where the Project is proposed. As proposed, the Department concludes that stabilizing the bank, whether the colony is present or not, is a significant impact because it would eliminate the nesting habitat. This species continues to decline within California and bank stabilization projects are one the primary causes (BANS TAC, 2013[1]). No mitigation measures or compensatory mitigation were developed to offset this significant impact. For the Project to avoid impacts to bank swallow, the bank stabilization project must be eliminated, re-designed, or one of the other Project Alternatives, such as Alternatives E, F, or G, must be selected. The Department recommends mitigation and/or compensatory mitigation be developed to ensure nesting habitat continues to exist

A9-07 (Cont.)

Red Bluff Dwarf Rush (*Juncus leiospermus* var. *leiospermus*)

Mitigation Measure 5.5(H) states, "*A qualified botanist will conduct a preconstruction survey for Red Bluff dwarf rush within the identifiable bloom season (March through June) directly prior to construction. If the species is not identified within the area of impact, no further mitigation is required.*" The Department recommends the following instead: "*A qualified botanist will conduct a preconstruction survey for Red Bluff dwarf rush within the identifiable bloom season (March through June) directly prior to construction.* ***A visit to a known reference site will be done prior to the preconstruction survey to ensure the timing of the field surveys was appropriate.*** *If the species is not identified within the area of impact, no further mitigation is required.*"

The mitigation measures further states, "*Should the species be identified within the area of impact, a 25-foot "no construction" buffer will be established and maintained using fencing.*" The measure does not specify if this fencing will be maintained in perpetuity or only during the construction phase of the Project. The Department recommends clarifying this sentence.

A9-08

The measure goes on to say,

> "*If avoidance is not possible, impacts to identified populations of Red Bluff dwarf rush shall be offset by preserving remaining populations to the extent feasible and/or replanting at a 1:1 ratio. Transplants shall be planted in suitable areas ecologically similar to the original sites as determined by the qualified biologist. A 25-foot buffer shall be established around preserved populations and replanting sites. The qualified biologist*

[1] Bank Swallow Technical Advisory Committee. 2013. Bank Swallow (*Riparia riparia*) Conservation Strategy for the Sacramento River Watershed, California. Version 1.0. www.sacramentoriver.org/bans/

shall place orange construction fencing around avoided and replanted populations prior to construction activities to ensure populations are protected. Final replanting density shall be consistent with what is impacted."

The Department generally considers salvage and relocation (translocation) to be an ineffective way to compensate for permanent impacts to rare, threatened, endangered, and sensitive native plants (rare plants)[2]. Rare plant translocations for mitigation have a low success rate (less than ten percent)[3] and the Department considers such efforts experimental, unless they have been demonstrated to be effective through long-term experimentation. Successful rare plant translocations require many years of habitat surveys, habitat modeling, site selection, seed collection, plant propagation, site preparation, monitoring, and remedial actions such as management of competing plants, supplemental watering, and supplemental planting. Success is not guaranteed, and even translocations that are initially successful may fail to persist over the long term.

Furthermore, transplantation efforts do not replace intact ecosystems or maintain the entire range of genetic diversity at the impact site. The presence of rare plants often signifies the presence of biogeographically important sites with unusual soil, microclimate, or other conditions that are not easy to identify and difficult or impossible to duplicate. Loss of genetic material from rare plant translocation may also hinder introduced populations from withstanding changing environmental conditions over time. Conservation translocation of plants requires consideration of a number of factors that might not be considered for animal species, such as microclimate, soil, pollinators, herbivory, weed management, mycorrhizal associations, and adequate monitoring that could reasonably span many years. These factors considerably increase the complexity and risk of failure of plant translocations. The most effective way to mitigate for permanent loss of rare plant habitat is therefore to protect and manage existing populations in their natural habitat.

A9-08 (Cont.)

As currently proposed, Mitigation Measure 5.5(H) would not reduce significant impacts to less than significant. Avoidance of this species, if present, is preferred. However, if that is not possible, purchasing offsite occupied habitat and preserving it in perpetuity at a ratio greater than 1:1 would be the next best option.

Western Spadefoot Toad (*Spea hammondii*)

Western spadefoot toad is a Priority 1 California Species of Special Concern (SSC), which are taxa that are likely to experience severe future declines and/or extirpation

A9-09

[2] Department of Fish and Wildlife. November 16, 2017. *Policy and Procedures for Conservation Translocations of Animals and Plants.* Bulletin Number 2017-05.
[3] Fiedler, Peggy L. 1991. Final Report Mitigation-Related Transplantation, Relocation and Reintroduction Projects Involving Endangered and Threatened, and Rare Plant Species in California.

without immediate conservation actions. The Department asserts that this species meets the criteria of a rare, threatened, or endangered species pursuant to CEQA Guidelines section 15380. Therefore, impacts to this species are potentially significant. Surveys for this species by a biologist familiar with its life history were not conducted. This species is known to occur approximately four miles east of the Project and according to the Biological Assessment prepared by Analytical Environmental Services, and dated July 2018, suitable breeding and foraging habitat exists on site for this species.

This species is primarily an upland species and comes out of dormancy to breed in vernal pools, stock ponds, and isolated pools within stream systems during winter rain events. Western spadefoot toads do not necessarily breed every year – both the timing and duration of rainfall events are important cues for the western spadefoot to come out of dormancy. Daytime and nighttime surveys are required to adequately survey for this species and should be conducted beginning in late winter through early May. Nighttime surveys are more likely to observe adult toads while the daytime surveys are easier for tadpole identification. Mitigation Measure 5.5(J) is vague and needs to provide clearer direction for the surveyor. Surveys should be done prior to the final design of the Project. A9-09 (Cont.)

If western spadefoot is present on the project site and avoidance of breeding ponds and adjacent upland habitat (up to 1,000 feet from breeding ponds) is not feasible, a western spadefoot mitigation plan that includes salvage of western spadefoot and creation of artificial breeding pools with adjacent upland habitat should be produced and submitted to the Department for written approval early within the planning process prior to project initiation. Breeding pools and adjacent appropriate upland habitat should be protected in perpetuity under a conservation easement and managed by a local land conservancy to assure that the pools and uplands are maintained in a manner that maximizes persistence of western spadefoot within these designated mitigation areas for that species.

Bat Surveys

Although not listed in the special status species table in the DEIS, pallid bats (*Antrozous pallidus*), a California SSC, are known to occur in oak woodlands. This species was discussed in the Biological Assessment prepared by Analytical Environmental Services, and dated July 2018. Given the amount of oak woodland habitat available onsite and known nearby water sources, there is a high probability the species could occur onsite at Alternative E. This species may meet the requirement of section 15380 of the CEQA Guidelines, and therefore impacts may be significant. There is not enough information provided in the DEIS to determine potential significant impacts to bat species as no formal or protocol survey was conducted to determine presence. The Department recommends conducting surveys during the appropriate time of year, by a qualified bat biologist. Sunset fly-out surveys as currently proposed in Mitigation Measure 5.5(N), may not be enough. A qualified A9-10

bat biologist should develop the appropriate mitigation measures specific to the type of bats present on the site.

A9-10 (Cont.)

Wildlife Movement Corridors

There is not enough information in the DEIS for the Department to determine if there is a significant impact to wildlife movement corridors. It does not appear a wildlife movement study was conducted as requested in the Department's December 29, 2016 comment letter.

As this project will impact a large area of habitat that lies in between other development, the Department recommends completing a Wildlife Movement Study to evaluate potential impacts to wildlife movement from the proposed project. The DEIS, page 4.5-1, states, "*Wildlife movement would not be restricted, as the majority of the Strawberry Fields Site will remain undeveloped.*" This is true; however, a large portion of the grassland area, which is a foraging area for many wildlife species, will be developed. Not only will the foraging area be permanently impacted, there will be noise, lighting, and other human caused issues, which will fragment the remaining undeveloped habitat. The Department is concerned that the DEIS does not address wildlife movement, fragmentation of habitat or cumulative impacts and recommend this be revisited before the Project is finalized.

A9-11

Lighting

The Department recognizes the effects that artificial lighting has on birds and other nocturnal species. The effects are numerous and include impacts to singing and foraging behavior, reproductive behavior, navigation, and altered migration patterns. Page 12 of the DEIS (Table 1: Summary of Impacts and Mitigation Measures) states, "*Lighting could increase collisions of birds with structures or cause avian disorientation.*" A non-reflective low-glare glass is expected to be used but there are no other details or discussion specifically looking at the different types that could be used. The Department recommends this be more clearly stated in the DEIS.

In addition to the impact of lighting on terrestrial species, lighting may also adversely impact fisheries. The area of the Sacramento River immediately adjacent to the proposed Project has been documented by Department staff to be a spawning and rearing area of critical importance to salmonids. To minimize impacts to adult spawning behavior and juvenile salmonid migration, lighting installed near the river, both temporary and permanent, should be kept to the absolute minimum necessary to provide safe pedestrian and automobile access. Lighting should only be directed at areas intended for illumination. Light reaching the water surface of the Sacramento River immediately below and adjacent to the Project should be kept as close to or lower than 1.0 lux as feasible. Following Project completion, measurements of lighting

A9-12

intensities should be taken at water level immediately below the lights, and at stations 50 feet, 100 feet, and 200 feet upstream and downstream of any Project lighting that illuminates the river. If 1.0 lux is substantially exceeded at the water surface corrective actions should be made to bridge lighting to achieve the desired illuminance.

A9-12 (Cont.)

If you have any questions regarding this comment letter, please contact Amy Henderson, Environmental Scientist, at (530) 225-2779 or Amy.Henderson@wildlife.ca.gov.

If the Redding Rancheria would like to request government to government consultation with the Department, it may do so by contacting Nathan Voegeli, Attorney and Tribal Liaison, at (916) 651-7653 or Nathan.Voegeli@wildlife.ca.gov.

Sincerely,

Tina Bartlett

Tina Bartlett
Regional Manager

ec: Chad Broussard
Environmental Protection Specialist
Chad.broussard@bia.gov

State Clearinghouse
state.clearinghouse@opr.ca.gov

Nathan Voegeli, Amy Henderson
California Department of Fish and Wildlife
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Comment Letter A10

STATE OF CALIFORNIA — GAVIN NEWSOM, *Governor*

CALIFORNIA STATE LANDS COMMISSION
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June 17, 2019

File Ref: SCH #2016114004

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

VIA REGULAR & ELECTRONIC MAIL (chad.broussard@bia.gov)

Subject: Draft Environmental Impact Statement (EIS) for the Redding Rancheria Fee-to-Trust and Casino Project, Shasta County

Dear Ms. Dutschke:

The California State Lands Commission (Commission) staff has reviewed the subject Draft EIS for the Redding Rancheria Fee-to-Trust and Casino Project (Project), which is being prepared by the Bureau of Indian Affairs (BIA). The BIA, as the public agency proposing to carry out the Project, is the lead agency under the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.). The Commission is a trustee agency for projects that could directly or indirectly affect land under the Commission's jurisdiction and the accompanying Public Trust resources or uses. Additionally, if the Project involves work on land under the Commission's jurisdiction then the Commission will act as a California Environmental Quality Act (CEQA) lead or responsible agency.

Commission Jurisdiction and Public Trust Lands

A10-01

The Commission has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The Commission also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (Pub. Resources Code, §§ 6009, subd. (c); 6009.1; 6301; 6306). All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust Doctrine.

The State of California holds these lands for the benefit of all people of the state for statewide Public Trust purposes, which include but are not limited to waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and

open space. On tidal waterways, the Commission's jurisdiction extends landward to the mean high tide line, except for areas of fill or artificial accretion or where the boundary has been fixed by agreement or a court. On navigable non-tidal waterways, including lakes, the state holds fee ownership of the bed of the waterway landward to the ordinary low-water mark and a Public Trust easement landward to the ordinary high-water mark, except where the boundary has been fixed by agreement or a court. Such boundaries may not be readily apparent from present day site inspections.

A10-01 (Cont.)

Based upon review of the Draft EIS and associated appendices, it appears that the Project will not involve use of land under the Commission's jurisdiction. However, Alternatives A, B, C, and D contemplate bank stabilization along the Sacramento River as part of the Project activities. As outlined in Section 6.2 of Appendix C (Redding Rancheria Casino Master Plan Draft Grading and Drainage Study), the bank stabilization recommendations would remove existing material above the ordinary high-water mark (outside Commission jurisdiction) and place a row of boulders over the area and up to at least the flood water surface elevation of the river. These boulders would then be covered with cobbly alluvium and finished with native loam to the desired grade.

A10-02

If any of the bank stabilization activities occur below the ordinary low-water mark of the Sacramento River, then a lease will be required by the Commission and the Commission will act as a CEQA lead or responsible agency. Please contact Ninette Lee, Public Lands Manager (see contact information below), for any questions regarding Commission leasing requirements.

In addition, Commission staff encourages the BIA to consider bioengineering as an alternative to rock protection and to include vegetative cover for the native loam as part of the Project in order to improve the structure's climate change resiliency. As stated in *Safeguarding California Plan: 2018 Update* (California Natural Resources Agency 2018), climate change is projected to increase the frequency and severity of natural disasters related to flooding, fire, drought, extreme heat, and storms. More frequent and powerful storms can result in increased riverine flooding conditions and damage from storm-created debris as well as decreased bank stability and structure. Conversely, climate-change induced droughts could decrease river levels and flow for extended periods of time. Climate change and sea-level rise will further influence riverine areas by changing erosion and sedimentation rates. Flooding and storm flow, as well as runoff, will likely increase scour and decrease bank stability at a faster rate.

A10-03

As shown in the photos on page 27 of Appendix C, the top four to eight feet of the streambank has already been eroded from exposure to high river flows in early 2017. Exposed portions of any current or future protective structures could remain at risk of accelerated deterioration from currents and floods, but vegetation can provide additional stability and would reduce the amount of erosion and scour pressure experienced during future storm and flood events.

Thank you for the opportunity to comment on the Draft EIS for the Project. If determined to be a responsible and trustee agency, the Commission would rely on the analysis

A10-04

present in the Final EIS for the issuance of any new lease as specified above and, therefore, we request that you consider our comments prior to certification of the EIS.

Please send copies of future Project-related documents, including electronic copies of the Final EIS, Mitigation Monitoring and Reporting Program, and Record of Decision when they become available. Please refer questions concerning environmental review to Alexandra Borack, Senior Environmental Scientist, at (916) 574-2399 or Alexandra.Borack@slc.ca.gov. For questions concerning Commission leasing jurisdiction, please contact Ninette Lee, Public Land Manager, at (916) 574-1869 or Ninette.Lee@slc.ca.gov.

A10-04 (Cont.)

Sincerely,

Eric Gillies, Acting Chief
Division of Environmental Planning
and Management

cc: Office of Planning and Research
N. Lee, Commission
A. Borack, Commission
J. Fabel, Commission

CALIFORNIA
Water Boards

Central Valley Regional Water Quality Control Board

17 June 2019

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

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED REDDING RANCHERIA FEE-TO-TRUST AND CASINO PROJECT, STATE CLEARING HOUSE #2016114004, SHASTA COUNTY

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) has received notification that Redding Rancheria (Tribe) is proposing to acquire approximately 232 acres of land in trust within Shasta County. The Tribe is also proposing to construct a resort that includes a casino, hotel, event/convention center, outdoor amphitheater, retail center, and associated parking/infrastructure. Details of the proposed project were provided in an April 2019 Draft Environmental Impact Statement (DEIS) report.

The DEIS evaluates several alternatives involving three possible project sites. The first is the Strawberry Fields Site located south of the City of Redding, the second is a site in the City of Anderson, and the third is the Existing Casino Site located within the City of Redding.

A11-01

The Central Valley Water Board appreciates the opportunity to provide comments regarding potential impacts to water quality that could result from the project. The Central Valley Water Board has the following comments based on its review of the DEIS:

I. Wastewater Treatment and Disposal

The proposed project alternatives describe two options for the treatment and disposal of domestic wastewater generated from onsite facilities: (1) Option 1 – collection and discharge to a municipal wastewater treatment and disposal facility, and (2) Option 2 – collection, onsite treatment, and discharge to an onsite, land disposal system.

A11-02

Estimated projected wastewater flows for each of the alternatives identified in the DEIS are summarized in the following table:

Estimated Wastewater Flow Projections – Alternatives Summary			
Alternatives	Average daily wastewater generation (gpd)	Peak hour flows (gpd)	Typical weekend maximum (gpd)
A (Strawberry Fields Site – Full Buildout)	200,300	500,750	289,000
B (Strawberry Fields Site – No Retail)	166,200	415,500	247,100
C (Strawberry Fields Site – Smaller Scale)	190,700	476,750	277,450
D (Strawberry Fields Site – No Casino)	69,300	173,250	91,000
E (Anderson Site)	191,100	485,250	281,000
F (Expansion of existing Casino)	4,000[1]	--	6,000[2]

[1]Estimated average increase in wastewater generation
[2]Estimated weekend peak demand increase in wastewater generation

A. Municipal Wastewater Treatment and Disposal

A11-02 (Cont.)

The Central Valley Water Board has the following comments on Option 1 – collection and discharge to a municipal wastewater treatment and disposal facility.

1. City of Redding's Clear Creek Wastewater Treatment Plant

Under Alternatives A, B, C, D, and F, the Tribe proposes to dispose of wastewater to the City of Redding's Clear Creek Wastewater Treatment Plant (Clear Creek WWTP).

Currently, Clear Creek WWTP is regulated under Waste Discharge Requirements (WDRs) Order R5-2017-0010 and National Pollutant Discharge Elimination System (NPDES) Permit Number CA0079731 and has an average dry weather flow (ADWF) limitation of 8.8 million gallons per day (MGD). The monthly average effluent flow from Clear Creek WWTP ranged from 5 to 17.7 MGD based on data from January 2016 through April 2019.

Moving forward with Option 1 for Alternatives A, B, C, D, or F would require confirmation from the City of Redding to ensure the facility could accommodate the additional flows generated by the Proposed Project.

2. City of Anderson Wastewater Treatment Plant (Anderson WWTP)

Under Alternative E, the Tribe proposes to send wastewater to the City of Anderson Wastewater Treatment Plant (Anderson WWTP). The Tribe estimates the average daily wastewater generation to be 191,100 gallons per day (gpd) with peak hour flows to 485,250 gpd and a typical weekend demand of 281,000 gpd.

Currently, Anderson WWTP is regulated under WDRs Order R5-2014-0100 and NPDES Permit Number CA0077704 and has an ADWF limitation of 2.0 MGD. The monthly average effluent flow from Anderson WWTP ranged from 0.93 to 2.76 MGD based on data from January 2016 through April 2019.

A11-03

Moving forward with Option 1 for Alternative E would require confirmation from the City of Anderson to ensure the facility could accommodate the additional flows generated by the proposed project.

B. Onsite wastewater Treatment and Disposal

The Central Valley Water Board has the following comments on Option 2 – collection, onsite treatment, and discharge to an onsite, land disposal system.

Option 2 for Alternatives A through D, which all concern the Strawberry Fields Site, proposes onsite wastewater discharges to land. Wastewater generated at the site would be treated through an immersed membrane bioreactor (MBR) system, disinfected, and discharged to an onsite leach field or recycled for non-potable water use, such as irrigation or toilet water. The size of the leach field varies from 16 to 45 acres for each of the four onsite disposal alternatives. The system would be designed with a 100 percent replacement area and twenty percent contingency to prevent failure of the system.

The DEIS states that wastewater from the project would be treated to California Code of Regulations, Title 22 Disinfected Tertiary Recycled Water criteria. Discharges from the system would also be regulated under the U.S. Environmental Protection Agency Underground Injection Control (UIC) Program as a Class V injection well. Regulation as a Class V injection well would prohibit discharge or movement of fluids that would cause underground sources of drinking water to exceed primary drinking water standards under Code of Federal Regulations, title 40, part 141 or other health standards.

1. Effect of Treated Effluent on Existing Hydrology and Water Quality

Although the DEIS states that effluent would be treated to Title 22 Disinfected Tertiary Recycled Water standards, which typically addresses pathogen removal, the treated effluent could have other constituents of concern that could have impacts to water quality. Further, although UIC Program requirements should prevent discharges from causing underlying groundwater to exceed primary drinking water standards, the DEIS does not provide information pertaining to the effluent water quality from the proposed treatment system. A11-04

The location of the Strawberry Field Site is in an area with highly permeable soils. Due to the proximity to the Sacramento River, treated effluent could migrate to the river or downgradient and potentially affect other sensitive receptors, such as drinking water wells of private residences and commercial facilities.

Currently, there are several individual and commercial Onsite Wastewater Treatment Systems (OWTS) located south of the proposed project site, most of which are regulated by the Shasta County Environmental Health Division. The Central Valley Water Board also regulates a few facilities under individual WDRs for RV and Mobile Home Parks. Due to the high permeability of soils and the presence of shallow groundwater in the area, some of these facilities have had difficulty complying with conditions of their permits and, in some cases, meeting water quality objectives in groundwater beneath their sites.

It is unknown how the discharge from the proposed project would impact the existing hydrology and water quality beneath the project and adjacent sites. The discharge could result in changes in groundwater elevations that may affect the vadose zone and treatment capacity of soils in the area. Additionally, discharges from the site could impact water quality in groundwater or the Sacramento River, downgradient or downstream of the project site. Due to the size of the proposed project, site specific conditions, and proximity to sensitive receptors, a comprehensive analysis of water quality impacts from wastewater discharges should be conducted.

2. Applicable Onside Wastewater Treatment Standards

The proposal also states that the Shasta County Sewage Disposal Standards, as amended through November 20, 2001, would be used as a basis of conceptual design of onsite treatment and disposal options for the project. These standards have been replaced by the County's Onsite Wastewater Treatment System Standards and Local Agency Management Plan that was implemented on 13 May 2018. These new standards should be reviewed to determine if conceptional design of the proposed onsite treatment and disposal options for the project need to be amended or revised.

A11-05

II. Storm Water Pollution Controls, and Wetlands Protection

The Central Valley Water Board has the following general comments on the proposed project.

A. Storm Water Discharges Associated with Construction and Land Disturbance Activities

Storm water associated with construction activity—including demolition, clearing, grading, and excavation—has the potential to discharge to waters of the United States. The project should be conditioned to implement storm water pollution controls during construction and post-construction to reduce or eliminate pollutants in storm water runoff. Discharges should not cause or contribute to a violation of any water quality standard.

Studies have found the amount of impervious surface in a community is strongly correlated with impacts on the community's water quality. New development and redevelopment result in increased impervious surfaces. The project should incorporate post-construction programs and design standards including (i) low impact design, (ii) source controls, and (iii) treatment controls to minimize the short and long-term impacts on receiving water quality. Best Management Practices should consider appropriate design standards, including a minimum sizing criteria for treatment controls, and establish maintenance requirements.

A11-06

B. Impacts to Waters of the United States and Waters of the State, including Isolated Wetlands

A total of 4.419 acres of waters of the United States were delineated within the study area, including 0.029 acres seasonal wetland, 4.366 acres riverine/perennial stream, and 0.024 acres intermittent stream. The project could impact these waters through modifications such as filling of wetlands or stream crossings. Steps should be taken to first avoid and minimize impacts to these waters and to then mitigate for unavoidable impacts. All areas of temporary impacts should be restored to pre-construction contours and conditions upon completion of construction activities.

If you have any questions pertaining to municipal wastewater collection and treatment facilities please contact Jeremy Pagan in the NPDES Unit by email at Jeremy.Pagan@waterboards.ca.gov, or by phone at 530-224-4850. For questions pertaining to Storm Water and Wetlands please contact Lynn Coster in our Storm Water Unit by email at Lynn.Coster@waterboards.ca.gov, or by phone at 530-224-2437. For questions pertaining to discharges to land please contact George Low in our WDRs Unit by email at George.Low@waterboards.ca.gov, or by phone at 530-224-3208.

A11-07

The above staff can also be contacted by mail at the footer address on the first page of this correspondence.

Clint E. Snyder, P.G
Assistant Executive Officer

GL: ch

cc: Steve Watson, Division of Drinking Water, SWRCB, Redding
Carla Serio, Shasta County Environmental Health Division, Redding
Kim Hunter, Shasta County Planning Division, Redding
Josh Keener, City of Redding, Redding
Phil DeBlasio, City of Anderson, Anderson
USEPA Region 9

Comment Letter T1

April 25, 2019

Via UPS Next Day Air

Amy Dutschke
Regional Director
Bureau of Indian Affairs
Pacific Region
2800 Cottage Way
Sacramento, CA 96001

Via UPS Next Day Air
Email: chad.broussard@bia.gov

Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs
Pacific Region
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

Re: Request for 120 Day Extension of Time to File DEIS Comments on the Redding Rancheria Fee-To-Trust and Casino Project

Dear Ms. Dutschke and Mr. Broussard:

I write on behalf of the Paskenta Band of Nomlaki Indians.

We are in receipt of the "Notice of Availability of a Draft Environmental Impact Statement for the Redding Rancheria Fee-to-Trust and Casino Project, Shasta County." We have downloaded and printed the Draft Environmental Impact Statement ("DEIS") and Appendices A through K.

The DEIS is 609 pages and the Appendices amount to over 5,000 pages. The Traffic Study (Appendix K) is just shy of 2,000 pages.

The Band intends to file detailed comments on the DEIS. It engages in Class III gaming under the Indian Gaming Regulatory Act to generate governmental revenues at a location that is 40 miles south of the proposed Project on Interstate 5, and the proposed Project will adversely affect those revenues. T1-01

We respectfully ask that you provide the Band and members of the general public who may similarly intend to submit comments with an additional 120 days, until October 2, 2019, to provide you with comments. We likewise request that you extend the date of the public hearing to September 20, 2019.

Given the magnitude of the materials to study and digest in order to fairly provide meaningful comments, we respectfully believe that these are modest requests.

Thank you very much for your consideration.

Sincerely,

Andrew Alejandre
Chairman, Paskenta Band of Nomlaki Indians

cc: Tribal Council, Paskenta Band of Nomlaki Indians

Comment Letter T2

Wintu Tribe of Northern California
&
Toyon-Wintu Center

PO Box 995 Shasta Lake, CA 96019
4755 Shasta Dam Blvd. Shasta Lake, CA 96019
Phone: (530) 605-1726 Fax: (530) 605-1727
Web: www.wintutribe.org Email: wintu.tribe1@gmail.com

May 8, 2019

Re: Request for 120 Day Extension of Time to File DEIS Comments on the Redding Rancheria Fee-To-Trust and Casino Project

Dear Ms. Dutschke and Mr. Broussard:

I write on behalf of the Wintu Tribe of Northern California (the "Tribe").

We intend to submit comments on the *Draft Environmental Impact Statement for the Redding Rancheria Fee-to-Trust and Casino Project* (DEIS), but we need more time than the June 3, 2019 deadline to do so.

The project site is in the indigenous territory of the Wintu people, our ancesters. This is noted in the DEIS, which identifies one of our villages at the north access to the proposed casino resort. *See* DEIS at 3.6-6 – 3.6-7. Other historically significant Wintu villages are directly impacted by this project.

The DEIS is 609 pages and the Appendices amount to over 5,000 pages.

We respectfully ask that you provide the Tribe and members of the general public who may similarly intend to submit comments with an additional 120 days, until October 2, 2019, to file comments. We likewise request that you extend the date of the public hearing to September 20, 2019.

T2-01

Given the magnitude of the materials to study and digest in order to fairly provide meaningful comments, we respectfully believe that these are modest requests.

Thank you very much for your consideration.

Sincerely,

Wade A. McMaster
Chairman
Wintu Tribe of Northern California

cc: Tribal Council, Wintu Tribe of Northern California

Comment Letter T3

Reg Dir ___
Dep Reg Dir ___
Dep BIA ___
Decrms Chad B.

Nor Rel Muk Wintu Nation
P.O. Box 1967 Weaverville, Ca. 96093
(530) 410-1125
E-mail: NRMWintu@gmail.com

Amy Dutschike
Regional Director
Bureau of Indian Affairs
Pacific Region
2800 Cottage Way
Sacramento, CA 96001

Chad Broussard
Environmental Protection Specialist
Bureau of Indian affairs
Pacific Region
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

Re: Request for 120 Day Extension of Time to File DEIS Comments of the Redding Rancheria Fee-To-Trust and Casino Project.

Dear Ms. Dutschke and Mr. Broussard:

I write on behalf of the Nor Rel Muk Wintu Tribal Nation.

The Tribe expect to submit comments on the Draft Environmental Impact Statement for the Redding Rancheria Fee-To-Trust and Casino Project (DEIS) and respectfully requests a 120 day extension to do so.

The project site is in the indigenous territory of the Wintu people, our ancesters. This is noted in the DEIS, which identifies a Wintu Villages at the north access to the proposed Casino resort. See DEIS at 3.6-6- 3.6-7. Other historically significant Wintu villages are directly impacted by this project. T3-01

The DEIS is 609 pages and the Appendices amount to over 5,000 pages.

We therefore respectfully ask that you provide the Tribe and members of the general public who may similarly intent to submit comments with an additional 120 days, until October 2, 2019, to file comments. We likewise request that you extent the date of the public hearing to September 20, 2019.

Given the magnitude of the materials to study and digest in order to fairly provide meaningful comments, we respectfully believe that these are modest requests.

T3-01
(Cont.)

Thank you very much for your consideration.

Sincerely,

John Hayward

John Hayward
Tribal Chair

Cc: Tribal Council, Nor Rel Muk Wintu Nation

Wintu Tribe of Northern California
&
Toyon-Wintu Center
PO Box 995 Shasta Lake, CA 96019
4755 Shasta Dam Blvd. Shasta Lake, CA 96019
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Web: www.wintutribe.org Email: wintu.tribe1@gmail.com

June 17, 2019

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

Re: DEIS Comments, Redding Rancheria Fee-to-Trust and Casino Project

Dear Mr. Broussard:

On behalf of the Wintu Tribe of Northern California ("Tribe"), I submit the following comments on the Redding Rancheria Fee-to-Trust and Casino Project Draft Environmental Impact Statement (DEIS). The Tribe is descended from the historic Wintun speaking peoples of the Sacramento Valley with significant historical and cultural connections to the proposed casino project site known as "Strawberry Fields".

The National Historic Preservation Act (NHPA) requires a federal agency to take into account any adverse effects on historical or culturally significant sites before taking action that might harm such sites. The DEIS is clear that historic archaeological resources have been found in the Area of Potential Effects (APE) encompassing the Strawberry Fields Site and Off-Site Access Improvement Area. The DEIS at page 4.6-2, identifies an historic Wintu village CA-SHA-266, known as *Yonotūmnomsono*, within the North Access Improvement Area. The DEIS recognizes that this site is eligible for listing in the National Register of Historic Places (NRHP) and that the project "will adversely affect" it. The *Yonotūmnomsono* site is only one of at least six historical Wintu villages located in the area that extend south through the Strawberry Fields site. However, the DEIS does not propose any Phase III pre-construction mitigation for the *Yonotūmnomsono* or additional investigation to determine NRHP eligibility for the remaining sites. In lieu of implementing a preemptive mitigation strategy, the DEIS proposes a "wait and see" approach that relies entirely on untrained construction worker awareness to identify archaeological resources or burial remains during excavation activities. The Tribe finds the

T4-01

mitigation strategy inadequate and lacking minimum protections for its historical and cultural resources.

T4-01 (Cont.)

In addition, Section 106 of the NHPA compels federal agencies to engage in consultation with the State Historic Preservation Office (SHPO), Advisory Council on Historic Properties (ACHP) and potentially affected Tribes to determine whether historic properties or traditional cultural properties exist in the APEs. The DEIS shows that there has been no attempt to consult with the SHPO or ACHP. The DEIS also explains that in April of 2016 a Phase II Testing and Evaluation investigation was completed on the Strawberry Fields site that did not include the Tribe despite specific requests by the Tribe to be included in the monitoring of any fieldwork. *See* DEIS pg. 3.6-5, 3.6-6; DEIS Appendix E – Cultural Resources Consultation. While prehistoric artifacts and archaeological evidence were recovered demonstrating the site was occupied from at least 750 A.D., Redding Rancheria monitors inaccurately determined the site had no cultural significance. *See* DEIS pg. 3.6-6.

T4-02

The Strawberry Fields Site and adjacent lands and waters constitute the indigenous territory of the Wintu people and are historically and culturally significant to the Tribe. For the reasons stated above, the Tribe finds the proposed mitigation measures inadequate and the consultation process in violation of the minimum standards of the NHPA.

T4-03

The Tribe also hereby incorporates, by reference, the comments of the Paskenta Band of Nomlaki Indians on the DEIS, in particular, those addressing Cultural Resources.

Sincerely,

Gary Rickard
Vice Chairman
Wintu Tribe of Northern California

June 17, 2019

Amy Dutschke
Regional Director
United States Department of the Interior
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way W-2820
Sacramento, CA 95825

Re: Comments on Draft Environmental Impact Statement, Redding Rancheria Fee-to-Trust and Casino Project

Dear Ms. Dutschke:

Thank you for the opportunity to review the Draft Environmental Impact Statement ("Draft EIS") for the Redding Rancheria Fee-to-Trust and Casino Project ("Project").

While the EIS remains in draft form, it is already an exceptionally thorough document satisfying both the letter and the spirit of the National Environmental Policy Act ("NEPA"). Accordingly, the comments below are intended to further strengthen the EIS, rather than to correct legal deficiencies. T5-01

1. Proposed Action, Best Management Practices, and Mitigation Measures (sections 1, 2, 4, and 5)

a. The Redding Rancheria desires to minimize and mitigate environmental issues, if any, that are identified through the EIS process. We are committed to incorporating Best Management Practices ("BMPs") into the Project and to implementing those BMPs (as well as any avoidance or mitigation measures specified in the Record of Decision) should the Project be approved. T5-02

b. We also remain committed to working with Shasta County and the City of Redding on matters relating to public services. The Tribe, the County, and the City have a long history of working together on a government-to-government basis, and we look forward to continuing that collaboration. T5-03

c. Law enforcement is one of the issues likely to be addressed among the Tribe, the County, and the City. However, it may also be helpful to have some additional information for purposes of the EIS process. The Tribe currently works with the Shasta County Sheriff's Office in a collaborative fashion. Contacts with the Sheriff's Office generally fall into one of three categories. First, the Sheriff's Office periodically requests assistance from Redding Rancheria's surveillance team to locate suspects or evidence involved in an off-reservation incident. Second, Tribal or Win-River Casino staff place service calls to the Sheriff's Office if needed to address any on-reservation disturbance. But the overwhelming majority of all Sheriff's Office contacts fall into a third category: situations where deputies enter the reservation without a service call and drive through the Win-River Casino's parking lots, presumably to search for individuals or evidence related to off-reservation incidents. In other words, most of the contacts between the Sheriff's Office and the Redding Rancheria arise from off-reservation occurrences that are unrelated to the Tribe or its gaming operation. We would be happy to provide specific data if that would be useful in your decision-making. T5-04

2. Alternative F (sections 1 through 5)

Thank you for your careful attention to Alternative F, which would involve expansion of the existing Win-River Casino facility. The following clarifications may be helpful in further refining the EIS analysis of that Alternative: T5-05

- The original Redding Rancheria (22 total parcels) is not wholly owned by the Tribe and is not fully available for development contemplated by Alternative F. Today, the Tribe owns 14.8 acres of on-reservation land, 8.51 of which are held in trust for the Tribe. It may be worth considering whether Figure 2-7 can provide additional detail in this regard.

- All of the Tribe's on-reservation lands are fully developed.

- The Tribe is interested in re-acquiring additional parcels from the original Redding Rancheria. Unfortunately, those parcels are not available for purchase. Despite the Tribe's interest and efforts, it has not been able to acquire additional on-reservation land.

T5-05 (Cont.)

- The current Win-River Casino property consists of approximately 6.2 acres of land currently held in federal trust for the Tribe; the Win-River Resort shares another 3.39 acres with the Tribe's administrative offices, which may not be fully available for Alternative F.

- Alternative F's proposed parking garage would take land currently used for Tribe's administrative offices.

3. Air Quality (sections 3.4, 4.4, and 4.15)

a. Sections 4.4 and 4.15 of the Draft EIS suggest that climate change is best evaluated in terms of cumulative impacts. We agree. However, it also appears that the climate change analysis within the "cumulative impacts" section of the Draft EIS is broad enough to include any climate impacts that could be considered "direct" or "indirect" as those terms are under NEPA.

T5-06

b. Our understanding is that Tribal New Source Review requirements apply to stationary sources rather than other source categories.

T5-07

4. Cultural and Paleontological Resources (sections 3.6 and 4.6)

a. We respectfully submit for your consideration the following information about the Redding Rancheria and its history:

- The Redding Rancheria includes the descendants of tribes who have lived in what is now Northern California since time immemorial.

- On August 16, 1851, United States Indian Agent O.M. Wozencraft entered a treaty with Indians representing several Northern California tribes. One of the signatories was Num-te-ra-re-man (also known as Norel-putis), a chief among the Wintu people. Current Tribal members include direct lineal descendants of Num-te-ra-re-man.

T5-08

- The Redding Rancheria was originally set aside for the Tribe's exclusive use and benefit in 1922, and it held in trust by the United States for the Tribe for nearly forty years. *See* Letter from W.S. Kreigh, Clerk, U.S. Dept. of Interior, Redding Dist., to Edgar Miller, Superintendent (May 29, 1922); Indenture (August 10, 1922).

- In 1958, Congress passed the California Rancheria Act, which authorized termination of the trust status of the lands and federal recognition of tribal status of 41 California Rancherias, including the Redding Rancheria. Pub. L. No. 85-671, 72 Stat. 619 (1958). The Tribe's federally recognized status, and the trust status of the Rancheria, were terminated by notice published in the Federal Register on June 13, 1952. 27 F.R. 1542 (Jun. 13, 1962). As part of the termination process, the Rancheria was divided into parcels and distributed to 17

individual tribal members in fee. *See* Plan for the Distribution of the Assets of the Redding Rancheria, according to the Provisions of Public Law 85-671, Enacted by the 85th Congress, Approved August 18, 1958.

- In 1979, the individual tribal members initiated a class action suit against the United States to restore the Tribe's federally recognized status and the trust status of the Rancheria. *See Tillie Hardwick, et al. v. United States, et al.*, Case No. C-79-1710 SW (N.D. Cal.). The litigation resulted in a stipulated settlement between the Tribe and the United States that restored the Tribe's federally recognized status, but did not restore the Tribal trust status of the original Rancheria lands. Because the Rancheria lands had previously been distributed to individual tribal members and the Tribe's federally recognized status had been terminated, the Tribe did not own any Rancheria lands at the time of the stipulated settlement.

- The stipulated settlement provided a 9-year window in which Rancheria parcels could be restored to trust status by the individual owners of those parcels. However, it did not provide any funding or streamlined process for the Tribe to re-acquire Rancheria lands or to restore those lands to trust status. Accordingly, the Tribe was left with no choice but to re-acquire the Rancheria parcels over time through purchase from individual landowners — at the Tribe's own expense — and to undergo the Department's discretionary fee-to-trust process for any parcels that remained in fee at the time of the Tribe's purchase.

T5-08 (Cont.)

- Today, the Tribe owns or controls only approximately 14.8 acres — or 48 percent — of the original Rancheria lands. This includes 14 parcels, 11 of which are owned by the Tribe (or by the United States in trust for the Tribe), and 3 of which are in the process of being transferred to the Tribe's beneficial ownership.
    - Of the 14.8 acres, 8.51 are held in trust for the Tribe and 6.29 are held in fee by the Tribe.
    - Approximately 6.2 acres are fully developed with the Win-River Casino Resort.
    - Approximately 3.65 acres are fully developed with the Tribe's administrative offices.
    - Approximately 3.39 acres are fully developed for shared use by the Win-River Casino Resort and Tribe's administrative offices.
    - The remaining trust acres are fully developed with the Tribe's Head Start Facility (1.06 acres) and historic burial ground (0.5 acres).

b. During the May 20, 2019, public hearing on the Draft EIS, a commenter from the Wintu Tribe of Northern California made several comments addressing the historical treatment of unrecognized tribes by the United States and the State of California. These issues are not directly relevant to the Project or the Draft EIS. But because Redding Rancheria was itself terminated at one time, our people fully understand the emotional pain and everyday challenges that can accompany termination or denial of federally recognized status. With that in mind, we thought it would be helpful to provide some additional information regarding the Redding Rancheria's ongoing commitment to work with and support our native community, regardless of formal federal recognition:

T5-09

- We recently supported the Ruffey Rancheria Restoration Act of 2018 (H.R. 3535), as amended, in an effort to assist a Northern California unrecognized group regain its former federally-recognized status. (Attachment A).

- We called upon state and federal agencies to close a 350-yard section of the McCloud River so that an unrecognized group could conduct a four-day cultural ceremony. (Attachment B).

- We offer cultural classes to members of unrecognized tribal groups and provide them with materials and gift cards to encourage greater participation.

- Through our Annual Sharing Fund, we provide hotel rooms, silent auction items and gift cards to the Wintu Tribe of Northern California. The Annual Sharing Fund also provides individual members of unrecognized tribal groups with funds for sponsorships, cultural activities, youth activities, emergency domestic violence assistance, burial assistance, transportation (often in the form of gas vouchers), and food and clothing assistance.

- We allow individual members of unrecognized groups to use our facilities for funerals, cultural functions, and other meetings.

- We administer a Low-Income Home Energy Assistance Program (LIHEAP) that provides temporary utility assistance to the local native community.

- We facilitate a diabetes support group that provides caregiver support, including a nutritious lunch three times per week, to individual members of unrecognized tribes.

T5-09 (Cont.)

Redding Rancheria desires to continue and enhance these programs, and the proposed Project will help increase the facilities, infrastructure, and resources available to do just that.

c. During the public hearing on the Draft EIS, a commenter from the Wintu Tribe of Northern California also suggested that the Project may disturb "one of the largest village sites in California." This is not accurate. The Project site has been subject to numerous cultural resource studies and surveys over the past 10-12 years, and the Tribe's cultural resource experts have been involved in each of them. These analyses found cultural features on portions of the Project site, confirming the Tribe's significant historical connection to the property. But none of the studies has revealed — or even indicated proximity to — anything that could reasonably be considered "one of the largest village sites in California." Indeed, there is no known site approximating that description at or near Strawberry Fields. Moreover, the Tribe has carefully designed the Project to preserve the vast majority of Strawberry Fields, thereby minimizing the possibility of any unanticipated impacts to cultural resources.

T5-10

*****

Thank you again for the opportunity to review and comment on the Draft EIS. Please do not hesitate to contact Tracey Edwards (TracyE@Redding-Rancheria.com) or Mike Hollowell (Michael.Hollowell@Redding-Rancheria.com) if you have any questions or desire additional information.

Sincerely,



Jack Potter, Jr.,
Redding Rancheria Chairman

Comment Letter T5

REDDING RANCHERIA

April 3, 2018

The Honorable Doug LaMalfa
Chairman, House Subcommittee on Indian, Insular, and Alaska Native Affairs
United States Congress
1324 Longworth House Office Bldg.
Washington, D.C. 20515

The Honorable Norma Torres
Ranking Member, House Subcommittee on Indian, Insular, and Alaska Native Affairs
United States Congress
1329 Longworth House Office Bldg.
Washington, D.C. 20515

Re: Redding Rancheria's Support For HR 3535, The Ruffey Rancheria Restoration Act of 2018

Dear Chairman LaMalfa and Ranking Member Torres,

As the Chairman of the Redding Rancheria in far Northern California, I am pleased and honored to express my Tribe's support for H.R. 3535 (as amended to exclude applicability to Shasta County), the Ruffey Rancheria Restoration Act of 2018 (the "Bill"), which will restore a neighboring Tribe deserving of regaining its former status as a federally-recognized Indian Tribe. T5-11

Because Redding Rancheria was itself once a federally terminated tribe, our people fully understand the emotional pain that accompanies the termination of federally recognized status and a governmental determination that one is no longer Indian, and also the financial and practical difficulties in regaining that status. The Redding Rancheria is proud of never having opposed another Indian Tribe's federal restoration. Although Redding Rancheria initially expressed concern to Chairman LaMalfa regarding the scope of Ruffey Rancheria's service area as written in an earlier draft of the Bill, I am pleased to report that Ruffey Rancheria's Chairman, Mr. Gomes, met with me like a good neighbor and listened to our concerns. As a result of that consultation, Ruffey Rancheria agreed to request an amendment that would expressly limit its service area to Siskiyou County, California, as we had requested. We have received a copy of the Bill that reflects that limitation of service area.

Ruffey Rancheria's interaction with Redding Rancheria has been a model of inter-tribal communication and cooperation, and we look forward to many more years of cooperation with it, on matters of mutual concern.

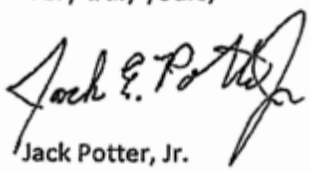
The tragic and disgraceful era of federal termination of Indian Tribes has ended, and the majority of California Rancherias have now been restored. We believe that it is time for our good neighbor, the Ruffey Rancheria, to be restored to federally recognized status, and accordingly we support the Bill restoring the Ruffey Rancheria without affecting any tribal rights in Shasta County. We notice that the Bill now provides protection for the Quartz Valley Rancheria and responds to some concerns raised by Oregon

2000 Redding Rancheria Rd. Redding, CA 96001 Tribal Office: 530-225-8979 Fax: 530-241-1879

tribes. It also appears that the Bill now includes some changes suggested in committee testimony by Deputy Assistant Secretary of Interior Tehsuda.

We appreciate Chairman LaMalfa's ongoing support of tribes and his efforts to resolve inter-tribal issues in the Bill. We look forward to continued co-operation with Chairman LaMalfa and the tribes of northern California in this and future matters of mutual concern. As part of this process we are also hopeful that the Ruffey Rancheria will reach out to the Karuk Tribe to discuss matters of mutual concern which the Bill raises—including membership and service area.

Very truly yours,



Jack Potter, Jr.
Chairman, Redding Rancheria

T5-11
(Cont.)

cc:

Mark Spannagel, Legislative Aid to Chairman LaMalfa, by email to mark.spannagel@mail.house.gov
Rudy Soto, Legislative Aid to Ranking Member Torres, by email to rudy.soto@mail.house.gov

REDDING RANCHERIA
TRIBAL COUNCIL RESOLUTION
030-06-12-12

SUBJECT: The Winnemem Wintu BaLas Chonas Winyupnas

WHEREAS: the Winnemem Wintu Tribe has celebrated BaLas Chonas Winyupnas on the McCloud River since time immemorial, and;

WHEREAS: ceremonies are core to the values and practice of the Winnemem culture and lifeway and are vital to the sustenance of the Tribe, and;

WHEREAS: the rites of passage of the next spiritual leader of the Tribe has been delayed for two years and she must celebrate her Coming of Age before August, 2012, when she turns 17 years old, and;

WHEREAS: it is the unalienable human right of young tribal women to access all that has been availed to the generations of women who went before her, and;

WHEREAS: the Winnemem Wintu deserve to conduct the ceremony in peace and dignity befitting a ceremony of this nature without interference, and;

WHEREAS: the Winnemem Wintu Tribe was entitled to have been included in the 1979 acknowledgement process that created a list of federally recognized California tribes, and;

T5-12

WHEREAS: in addition to its continuous historic relationship with the Federal Government, the trust status of the Tribe was reaffirmed by the provisions of the Act of July 30, 1941 (55 Stat. 612, chapter 334), which granted to the United States all tribal and allotted Indian land within the area embraced by the Central Valley Project, and;

WHEREAS: under that Act, the Secretary, acting through the Commissioner of Reclamation, on January 5, 1942, created the Shasta Reservoir Indian Cemetery, which contains Winnemem Wintu remains, markers, and other appurtenances held in trust by the United States, and;

WHEREAS: Winnemem Wintu remains were removed to that cemetery from the traditional cemetery of the Tribe in the McCloud River Valley that was flooded by the Shasta Reservoir, and;

WHEREAS: the Bureau of Reclamation informed the Area Directory of the Indian Service in writing on December 22, 1942, of the new cemetery and its status as Federal trust land, and;

WHEREAS: the Secretary, through an administrative oversight of inaction of the Indian Service, overlooked the trust status of the Tribe, which was reaffirmed by the making of partial restitution by the Secretary for taking tribal land and the 1941 relocation of remains of tribal members, which remain interred in the Shasta Reservoir Indian Cemetery, and;

WHEREAS: the Legislature of the State of California passed AJR 39 recognizing that the Winnemem are a historical tribe of California, and urges reinstatement of federal recognition, and;

WHEREAS: in 2011, President Obama signed the United Nations Declaration on the Rights of Indigenous People, a document which clearly supports the freedom of religion and culture and the special relationship with the land of all indigenous people regardless of governmental "recognition" status, and;

WHEREAS: the location of the ceremony is within the U.S. Department of Agriculture, Shasta-Trinity National Forest jurisdiction and in the McCloud River watershed, on Winnemem traditional lands that have never been adjudicated by law, but now is jointly controlled by the U.S. Forest Service and Shasta County, and;

WHEREAS: the responsible government agencies have failed to provide the necessary privacy and protections to allow the Tribe to hold their ceremony in peace and dignity, and;

T5-12
(Cont.)

THEREFORE, BE IT RESOLVED, THAT: the Redding Rancheria Tribe calls upon the relevant state and federal agencies to do everything within their stated and discretionary authority to close the section of the McCloud River between the McCloud Bridge and McCloud Point, a distance of approximately 350 yards, for the duration of 4 days of the ceremony, and;

BE IT FURTHER RESOLVED, THAT: the Vice-Chairperson, Jack Potter, Jr., send a copy of this resolution to the Winnemem Wintu Tribe, USDA Forest Service Supervisor and other relevant State and Federal agencies urging the temporary closure of the McCloud River.

CERTIFICATION

The foregoing resolution was passed by a vote of 6 for, 0 against, and 0 abstentions at a duly called meeting of the Redding Rancheria Tribal Council, at which a quorum was present, on this 12th day of June, 2012.

Chairperson, Redding Rancheria Tribal Council — Date: 6-25-12

Secretary, Redding Rancheria Tribal Council — Date: 6-22-12

Comment Letter T6

COMMENTS OF THE PASKENTA BAND OF NOMLAKI INDIANS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE REDDING RANCHERIA FEE-TO-TRUST AND CASINO PROJECT

JUNE 17, 2019

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The Paskenta Band of Nomlaki Indians, through counsel, hereby submits comments on the *Draft Environmental Impact Statement: Redding Rancheria Fee-to-Trust and Casino Project* (April, 2019) (the "DEIS").

INTRODUCTION

The Paskenta Band of Nomlaki Indians (the "Band") has a significant interest in the proceedings of the Department the Interior ("DOI" or "Interior"), Bureau of Indian Affairs ("BIA" or the "Agency") to take land into trust for the Redding Rancheria ("Redding" or the "Rancheria") to engage in casino gaming under the Indian Gaming Regulatory Act ("IGRA") on a 232-acre site adjacent to Interstate 5 just south of the City of Redding, known as Strawberry Fields.

First, Redding's operation of a casino resort at Strawberry Fields will reduce the Band's earnings before interest, taxes, depreciation, and amortization from its IGRA gaming facility at the Rolling Hills Casino – located 46 miles south of Strawberry Fields on Interstate 5 – by between 35 and 38 percent. *See* Global Market Advisors, *Evaluation of the Impact of the Redding Rancheria Fee-to-Trust and Casino Project on the Rolling Hills Casino* (May, 2019) ("*GMA Impact Evaluation*"), attached hereto as Exhibit A, at 3, 43-45. The *GMA Impact Evaluation* is incorporated herein by reference. T6-01

Second, throughout history, the Band's Nomlaki ancestors migrated to Strawberry Fields to engage in salmon fishing and related economic relations with the Wintu people, the indigenous occupants of Strawberry Fields, from time immemorial, and these Nomlaki ancestors likely perished alongside Wintu in one of the largest massacres of T6-02

Native people: that carried out by John Fremont and his forces in 1846. *See* Dorothea Theodoratus, Ph.D. and Kathleen McBride, M.A., *Report on Tribal Historical Connections to the "Strawberry Fields" Site Near Redding California* (May 29, 2019) ("Theodoratus & McBride"), attached hereto as Exhibit B, at 3, 12. In this light and for other reasons enumerated in the comments below, (1) Strawberry Fields should be eligible for registration in the National Register of Historic Places, (2) Redding's proposed casino resort will significantly impact historical and cultural resources at the site, (3) and the Band has an interest in protecting the integrity of those resources.

T6-02 (Cont.)

DOI is not unfamiliar with the Band's concerns about the manner in which it has proceeded with the Strawberry Fields land-in-trust application. On December 12, 2017, the Band's Chairman, Andrew Alejandre, members of the Paskenta Tribal Council, and the Band's legal counsel met with DOI's Associate Deputy Secretary, James Cason, and other DOI representatives to seek clarity on the DOI's reversal of its 2010 formal opinion that Interior could not invoke the so-called "restored lands" exception under IGRA to take Strawberry Fields into trust for Redding to engage in casino gaming there.[1] Interior's reversal of its 2010 opinion position took the form of a private Memorandum of Understanding ("MOU") between DOI and Redding, which the Band was only able to obtain through a request to DOI pursuant to the Freedom of Information Act ("FOIA").[2] Associate Deputy Secretary Cason invited the Band to set forth the legal and policy

T6-03

[1] A copy of DOI's 2010 opinion, *U.S. Dept. of the Interior Decision on Redding's Request for "Restored Lands" Determination on "Strawberry Fields"* (Dec. 22, 2010) ("*DOI Restored Lands Decision*") is attached hereto as Exhibit C.

[2] A copy of the MOU with related FOIA correspondence between the Band's legal counsel and DOI is attached hereto as Exhibit D.

reasons for why Interior should reconsider its MOU position. The Band did so by letter with accompanying analysis, entitled *Request for Reconsideration of "Restored Lands" Position Taken by the Department of the Interior in its October 3, 2016 Memorandum of Understanding With Redding Rancheria,* dated January 31, 2018 ("*Request for Reconsideration of MOU*"). DOI then gave Redding the opportunity to respond to the Band's *Request for Reconsideration of MOU* within 30 days. After obtaining an extension to do so, Redding submitted a response by letter dated April 17, 2018 (*Redding's April 17, 2018 Response*). DOI would not provide the Band with a copy of Redding's submission without a FOIA request from the Band. After filing a FOIA request for that submission and reviewing it, the Band filed with DOI a *Supplemental Submission in Support of Request for Reconsideration of "Restored Lands" Position Taken by the Department of the Interior in Its October 3, 2016 Memorandum of Understanding With the Redding Rancheria,* dated December 27, 2018 ("*Supplemental Submission*"). Finally, in March, 2019, the Band's Chairman, Andrew Alejandre, members of the Paskenta Tribal Council, and the Band's legal counsel met with DOI's Principal Deputy Assistant Secretary, John Tahsuda III, DOI legal staff, and others to discuss the status of the Band's reconsideration requests. At that meeting, Mr. Tahsuda informed the Band that its reconsideration request was under active consideration by the DOI's Solicitor's Office.[3]

T6-03
(Cont.)

The Band now respectfully submits its comments on the DEIS as set forth below.

[3] The Band is not attaching hereto its *Request for Reconsideration of MOU*, its FOIA request to DOI for *Redding's April 17, 2018 Response*, DOI's response to that FOIA request, or the Band's *Supplemental Submission*. The Band requests, however, that these items be made part of the administrative record in this matter.

I. THE COMMENT PERIOD IS INADEQUATE, AND THE DEIS FAILS TO PROVIDE NECESSARY SUMMARIES.

By letter dated April 25, 2019, the Band requested that the comment period be extended for an additional 120 days. A copy of the Band's request is attached hereto as Exhibit E. In response to this request and requests from the public, the comment period was extended only two weeks to June 17, 2019. The comment period and two week extension are extremely inadequate to review over 5,000 pages of material making up the DEIS and appendices. This deprives the Band, other relevant governmental entities, and the public at large with a meaningful opportunity to review and comment on the DEIS. For this reason alone, further circulation is warranted. The Band anticipates sending additional technical comments in the next few months and requests that these comments be made part of the public record.[4]

T6-04

The inadequate time for the public to properly digest the DEIS to provide thorough comments is compounded by the Agency's failure to comply with requirements that guide public review. For example, the DEIS should include a summary discussion of the following topics specified by CEQ NEPA Regulations (40 CFR §1502.16) and the BIA NEPA Guidebook (59 IAM 3-H §8.4.8) and reference where these issues are discussed in the DEIS.

T6-05

(1) Any adverse effects that cannot be avoided;

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[4] Email correspondence within DOI obtained by means of FOIA requests shows that the Agency and Interior have been extraordinarily deadline-driven in moving through the process required by the National Environmental Policy Act ("NEPA"). A sampling of that correspondence is attached hereto as Exhibit F. *See, e.g.,* Exhibit F, email dated 2/1/19 from Maria Wiseman to Chad Broussard, stating "our FEIS briefing dates have been approved for. . . Sept (Redding)," and email dated 2/5/19 from Chad Broussard to Maria Wiseman, stating "We should be able to meet the FEIS briefing dates."

(2) The relationship between short-term uses of the human environment and the maintenance and enhancement of long-term productivity;

(3) Any irreversible and irretrievable commitments of resources;

(4) Possible conflicts between the proposed action and the objectives of Federal, tribal, regional, state and local land use plans, policies and controls for the area(s) of concern;

(5) Energy requirements and conservation potential of alternatives and mitigation measures;

(6) Natural or depletable resource requirements and conservation potential of alternatives and mitigation measures; and

(7) The design of the built (manmade infrastructure) environment, including the reuse and conservation potential of alternatives and mitigation measures.

T6-05 (Cont.)

In addition, the DEI was accessed online and lacks a cover sheet as required by 40 CFR §1502.10 and §1502.11.

T6-06

II. DOI WILL VIOLATE IGRA IF IT TAKES EITHER STRAWBERRY FIELDS OR THE ANDERSON SITE INTO TRUST FOR GAMING WITHOUT PROCEEDING WITH A "TWO-PART DETERMINATION."

A. INTRODUCTION.

Pursuant to IGRA, Congress expressly prohibited Indian tribes from gaming on lands taken into trust by DOI after IGRA's enactment on October 17, 1988, unless, in pertinent part, either: (a) the Secretary, after consultation with the tribe seeking to engage in gaming on such lands and with state and local officials, including other nearby tribes, determines that the gaming establishment will be (i) in the best interests of the tribe and (ii) not detrimental to the surrounding community, and the Governor of the State where the gaming is to occur concurs in that determination (the so-called "two-part determination" exception), or (b) the lands are taken into trust *"as part of"* (i) a

T6-07

settlement of a land claim, (ii) the initial reservation of a tribe acknowledged by the Secretary, or (iii) *"the restoration of lands for an Indian tribe that is restored to Federal recognition"* (the so-called "restored lands" exception). 25 U.S.C. § 2719(b)(1) (emphasis added).

Because Congress gave little guidance as to what constitutes the restoration of lands for a restored tribe under the restored lands exception, the Secretary of Interior promulgated regulations to implement § 2719(b)(1). Pursuant to those regulations, to invoke the restored lands exception, a tribe must demonstrate (1) a modern connection to the land, (2) a "significant historical connection" to the land, and (3) "a temporal connection between the date of the [trust] acquisition of the land and the date of the tribe's restoration." 25 C.F.R. § 292.12. Redding cannot demonstrate the requisite temporal connection between the date of the proposed trust acquisition of either the Strawberry Fields Site or the Anderson Site. For the Strawberry Fields Site, Redding also lacks the requisite historical connection.

T6-07 (Cont.)

B. NEITHER STRAWBERRY FIELDS NOR THE ANDERSON SITE QUALIFIES FOR THE "RESTORED LANDS" EXCEPTION UNDER IGRA BECAUSE THE REQUISITE "TEMPORAL CONNECTION" IS MISSING.

1. Background

The original Redding Rancheria consisted of 30 acres purchased by the United States in 1922. *See DOI Restored Lands Decision* at 1.[5] In 1965, Congress terminated the Rancheria pursuant to the California Rancheria Termination Act of 1958. The Rancheria was later restored to federal recognition on June 11, 1984 "pursuant to a court-

T6-08

[5] The Band is not attaching hereto the source materials cited in the footnotes to the *DOI Restored Lands Decision*. The Band requests, however, that those materials be made part of the administrative record.

approved settlement with the United States" on the heels of the federal court decision in *Hardwick v. United States* No. C79-1710 SW (N.D. Cal. 1983). *DOI Restored Lands Decision* at 2, 5. "The Tribe's first trust holdings came in 1992." *Id.* at 2. In 1995, the Tribe applied to Interior to take additional lands into trust. *Id.* After entering into a compact with California in 1999, the Tribe opened its Win-River Resort & Casino to commence Class III gaming pursuant to IGRA. Sometime prior to April 19, 2006, Redding filed an application with DOI to accept 152 acres of the Strawberry Fields Site into trust. *DOI Restored Lands Decision* at 2. In July 2010, Redding amended its application to include an additional adjacent 80 acres. *Id.* at 3. (The two sites, combined, are referred to herein as the "Strawberry Fields" or the "Strawberry Fields Site.").

In December 2008, Redding asked Interior to opine on its ability to take the Strawberry Fields Site into trust for gaming under the "restored lands" exception described above. On December 22, 2010, Interior issued a formal decision concluding that Redding could not establish the temporal connection between this land-in-trust acquisition for gaming and Redding's restoration as required by Interior's regulations. *Id.* at 7-8.

T6-08 (Cont.)

In accord with those regulations, to meet the temporal connection to restoration, a tribe "must demonstrate a temporal connection *between the date of the acquisition and the date of the tribe's restoration*." 25 C.F.R. § 292.12(c) (emphasis added). This requires a showing that either (1) the land is part of the tribe's first request for newly acquired lands after its restoration, or (2) the tribe "submitted an application to take the land into trust within 25 years after the tribe was restored to Federal recognition *and the*

tribe is not gaming on other lands." *Id.* (emphasis added). The Strawberry Fields Site is not part of Redding's first request for newly acquired lands after restoration: it had "newly acquired lands" taken into trust, post-restoration, in 1992 and in §1995.[6] So Redding must make the second showing for a temporal connection between DOI's acquisition of Strawberry Fields or Anderson for gaming and the tribe's 1984 restoration. Redding could meet the 25 year deadline (at least with respect to the first 152 acres of the Strawberry Fields Site); that deadline was June 11, 2009, and Redding applied to have Interior take that land into trust sometime before mid-April, 2006. *See DOI Restored Lands Decision* at 2, 7. But Interior held that Redding could not meet the "is not gaming on other lands" requirement of the regulation for the simple reason that "*the Tribe's existing gaming [Win-River] facility precludes a finding under this section.*" *Id.* at 8 (emphasis added).

T6-08
(Cont.)

DOI therefore concluded that "[b]ecause the Tribe cannot meet the standards articulated in Section 292, the Parcels are not eligible for the restored lands exception." *Id.* It said that Redding could use the Strawberry Fields Site for non-gaming purposes, but that if it wanted to pursue the site for gaming, it would have to submit an application to invoke the above-referenced two-part determination under § 2719(b)(1)(A) of IGRA. *Id.* The same logic would obviously preclude Redding from gaming on the Anderson Site.

In a subsequent lawsuit brought by Redding against the Secretary of Interior, Redding asserted that if it were willing to close the Win-River Resort & Casino before

[6] "Newly acquired lands" are lands that have or will be taken "in trust for the benefit of an Indian tribe by the United States after October 17, 1988." 25 C.F.R. § 292.2.

opening its proposed new casino resort at Strawberry Fields, it should be able to meet the "temporal connection" requirement to qualify Strawberry Fields for the "restored lands" exception. DOI responded that Redding's position ignored the plain language of the regulation:

> A tribe may qualify for the "restored lands exception" if it can show that "[t]he tribe submitted an application to take the land into trust within 25 years after the tribe was restored to Federal recognition and the tribe is not gaming on other lands." 25 C.F.R. § 292.12(c)(2). *The regulation is written in the present tense, and makes no exception for whether the tribe "will be gaming on other lands" in the future.*
>
> The Tribe objects that the Secretary "acted arbitrarily in refusing to consider the Tribe's plan to relocate its gaming operation." Br. of Appellant at 56. *But the regulations are clear, and contain no provision for an expression of future intent with an undefined time frame.*

Answering Brief of Federal Appellees (Sept. 28, 2012), filed in *Redding Rancheria v. Salazar,* No. 12-15817, U.S. Court of Appeals for the Ninth Circuit, DktEntry 23 at 59-60 ("*DOI's Answering Brief*"), attached hereto as Exhibit G (emphasis added). In a split decision, the U.S. Court of Appeals for the Ninth Circuit vacated the DOI's 2010 decision and ordered it to consider "the Tribe's proposal to close its existing gaming operation upon construction of a new facility." *Rancheria v. Jewell,* 776 F.3d 706, 715 (9th Cir. 2015).

T6-08 (Cont.)

Further agency proceedings thereafter went silent. As noted above, the Band was able to obtain by means of a FOIA request, a copy of a private MOU through which former Assistant Secretary, Larry Roberts, and Redding privately came to "an agreement as to the application of the Restored Lands Exception to Strawberry Fields." *See* MOU at

2 ¶M. In a complete reversal of its formal decision and the legal position it took before the Ninth Circuit, Interior agreed in the MOU that

> the Tribe can satisfy the second requirement of 25 C.F.R. § 292.12(c)(2) if it permanently closes its Win-River Casino or any other gaming operation of the Tribe before it conducts any gaming at Strawberry Fields.

Id. at 3 ¶5(b). It further agreed "to issue a determination that . . . Strawberry Fields will be gaming-eligible under the Restored Lands Exception if and when the land is taken into trust" notwithstanding the "continued operation of the existing Win-River casino on the Tribe's reservation until such time as gaming begins at Strawberry Fields." *Id.* at 3 ¶8. Missing from the MOU is any rationale for Interior to abandon its prior position that the plain language of the regulation forecloses such a course because "[t]he regulation is written in the present tense, and makes no exception for whether the tribe 'will be gaming on other lands' in the future. . . . [;] the regulations are clear, and contain no provision for an expression of future intent with an undefined time frame." *DOI's Answering Brief* at 59-60.

T6-08
(Cont.)

2. Argument

As set forth below, Interior's MOU position guts the temporal connection requirement. Under its MOU position, a restored tribe can fully realize the benefits of IGRA gaming, but later identify what might appear to be a more lucrative gaming site, apply to take the new site into trust, continue to realize all of the restoration benefits from IGRA gaming, and *decades after its date of restoration* (Redding is already 35 years out from its restoration date) have DOI take the new site into trust for gaming. Under no reasonable reading of the statute or the regulations can such a trust acquisition for gaming

be considered "part of" a tribe's restoration. Indeed, the "restored lands" exception is designed to give restored tribes a jump start, to quickly realize the benefits of IGRA gaming for their restoration process. It thereby allows them to bypass the more cumbersome, less certain, "two-part determination" exception, which requires the Secretary of the Interior to consult with state, local, and tribal governments in deciding whether a new gaming establishment could be detrimental to the surrounding community, and to obtain the state governor's concurrence in that determination.[7] Redding, which is already realizing the benefits of gaming on trust lands "as part of" its restoration, must proceed through the two-part determination exception to have DOI take either the Strawberry Fields Site or the Anderson Site into trust for gaming.[8]

T6-08 (Cont.)

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[7] Between 1994 and 1997, the BIA interpreted "nearby Indian tribes" with whom consultation was mandatory for the two-part determination exception to include those within 100 miles of the proposed newly acquired lands. *See* 73 Fed. Reg. at 29357 (citing BIA Checklist for newly acquired lands). In 1997, the BIA modified its view and interpreted "nearby Indian tribes" to include those within 50 miles of the proposed gaming establishment "because [its] experience with the 1994 standard was that it included communities that were not impacted by the gaming establishment." *Id.* After Interior promulgated its governing regulations in 2008, the BIA further modified its view and interpreted "nearby Indian tribes" to include only those within a 25-mile radius. *Id.* But an Indian tribe located beyond the 25-mile radius can petition the BIA for consultation if it can show that "its governmental functions, infrastructure or services will be directly, immediately and significantly impacted by the proposed gaming establishment." 73 Fed. Reg. at 29376; 25 C.F.R. § 292.2. DOI's MOU position deprives the Band of the opportunity to the petition the BIA for consultation notwithstanding the fact that Redding's proposed casino resort will cause it to lose between 35 and 38 percent of its governmental revenues. *See GMA Impact Evaluation* at 3, 43-45.

[8] It is plain from the IGRA's legislative history and DOI's commentary on its implementing regulations that the two-part determination exception is meant to be the operative, default provision for Indian nations to take land into trust for gaming after IGRA's enactment. The final committee reports and colloquies in the Congressional Record reveal that intent. *See, e.g.,* Sen. Rep. 100-446 at 8 ("Gaming on newly acquired lands outside of reservations is not generally permitted unless the Secretary determines that gaming would be in the tribe's best interest and would not be detrimental to the local community. . . ."); Congressional Record—House, Sept. 26, 1988 at 25380 ("I am particularly pleased with section 20 of this legislation . . . [which] prohibits Indian gaming on land not adjacent to Indian reservations . . . [unless] the Secretary . . .

* * *

It bears repeating the temporal connection requirement of 25 C.F.R. § 292.12(c):

> [T]he tribe must be able to show that either:
>
> (1) The land is included in the tribe's first request for newly acquired lands since the tribe was restored to Federal recognition or
>
> (2) The tribe submitted an application to take the land into trust within 25 years after the tribe was restored to Federal recognition and the tribe *is not gaming on other lands*.

Clearly, a restored tribe faces no time constraint whatsoever for gaming on land that is part of its first request for newly acquired lands since restoration. Such gaming will, by definition, be temporally tied to such that tribe's restoration; a landless previously "terminated tribe" should be given every opportunity to realize the benefits of IGRA for its restoration whenever it is able to first restore its land base. Thus, § 292.12(c)(1) makes perfect sense, giving restored tribes an open-ended opportunity to commence gaming on their first trust lands after they are restored to federal recognition. After that, however, § 292.12(c)(2) clearly constrains future gaming opportunities: in order to proceed with gaming on lands taken into trust for the second, third, or fourth time after restoration, the tribe must (a) submit the application to Interior within 25 years of restoration and (b) not already be gaming on other lands: that is, not already realizing the benefits of IGRA for restoration *at the time of the application*.

T6-08
(Cont.)

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consult[s] with State and local officials, including officials of nearby Indian tribes that might be affected, to determine that such gaming would be in the best interest of the Indian tribe[] and its members and that such gaming would not be detrimental to the surrounding community. . . .") (statement of Rep. Bereuter). DOI expressed the same sentiment in addressing the ability of an Indian tribe engaged in gaming on its initial reservation to take new lands into trust for gaming: "If other newly acquired land is declared a reservation, gaming can occur on it *under the two part determination* without precluding gaming on the initial reservation." 73 Fed. Reg. at 29361 (emphasis added).

The question boils down to this: Does the "is not gaming on other lands" requirement of 25 C.F.R. § 292.12(c)(2) mean (a) consistent with *DOI's Answering Brief* in the Ninth Circuit, that the restored tribe at issue must not be gaming on other lands *at the time that it applies* to take new lands into trust for gaming or (b) as the DOI-Redding MOU purports to conclude, that the restored tribe at issue must not be gaming on other lands *when it commences gaming on new lands* taken into trust by the Interior Department?[9]

Thus 292.12(c)(2) addresses a situation, like that of Redding, *when a restored tribe is already realizing the benefits of IGRA as part of its restoration* and wants to apply to the Interior Department to take land into trust for new gaming. As set out above, Congress designed the "restored lands" exception to allow restored tribes to bypass the accountability requirement of the two-part determination only in the limited setting when the trust acquisition for gaming is "part of" the tribe's restoration, and that requires the existence of a temporal connection between (a) the land-in-trust process and (b) the Tribe's date of restoration. In accord with this clear Congressional intent that there be a

T6-08
(Cont.)

[9] A third construction of the phrase "is not gaming on other lands," one which DOI apparently has not entertained to date, would be that the restored tribe at issue is not gaming on other lands *when DOI takes the new land into trust*. For the reasons set forth in the text, the construction most consistent with the plain language of IGRA and the limited option for a restored tribe to bypass the accountability requirements of the two-part determination exception, ties the "is not gaming on other lands" requirement to the date of a restored tribe's application to take the lands into trust for gaming. We point out, however, that a construction that would tie the "is not gaming on other lands" to the date that DOI takes new lands into trust for a restored tribe would be more plausible than DOI's MOU position, which ties that requirement to the date that a restored tribe commences gaming after DOI acquires the land into trust. Both alternatives involve completely unknown future dates, but if the "is not gaming on other lands" requirement is tied to the date that DOI takes the land into trust, the acquisition would at least have a closer temporal connection to the tribe's date of restoration. If it is tied to the date that the tribe commences gaming after the trust acquisition and after the construction of the new gaming facility, the temporal connection between the trust acquisition and the date of the tribe's restoration is entirely lost.

temporal connection between a restored tribe's date of restoration and its new trust acquisition for gaming to warrant by-passing the two-part determination, it only makes sense that a restored tribe that has already been gaming under IGRA as part of its restoration and wants new or additional gaming be required to (a) apply to take the land into trust within 25 years of the date of its restoration and (b) discontinue its IGRA gaming at the time that it submits that application.

This is the only way in which such a restored tribe's IGRA gaming will be temporally connected to its date of restoration to justify bypassing the accountability requirements of the two-part determination. By discontinuing existing gaming *upon applying* to take new lands into trust for gaming, such a restored tribe should get that bypass in the same manner as a restored tribe that seeks to engage in gaming on lands that are the subject of its first request for newly acquired lands. By ceasing its existing gaming (after realizing the benefits of IGRA for up to 25 years) upon applying to take land into trust for new gaming, a tribe, like Redding, would be on a par with a restored tribe that has not been realizing the benefits of IGRA and seeks to game on its first trust lands. Both settings equally justify bypassing the accountability requirements of the two-part determination because, in each, the trust acquisition for gaming is immediately connected to the tribe's restoration. That is not the case when a tribe has already realized the benefits of IGRA gaming post-restoration, continues to realize those benefits for decades, and then takes new land in trust decades later for more a more lucrative gaming opportunity.[10]

T6-08 (Cont.)

[10] There is nothing unfair about the choices faced by a restored tribe that is already gaming as part of its restoration and wants to open a more lucrative gaming facility on new trust lands: it

DOI's MOU position jettisons the requisite temporal connection and Congress's clear intent to strictly limit the opportunity for restored tribes to engage in gaming on new lands without the accountability to affected tribal, state, and local governments required by the two-part determination. Redding has already been realizing the benefits of IGRA gaming and operating a lucrative casino resort *as part of its restoration* for decades; pursuant to the MOU, DOI would now condone Redding's development of a new, expanded, even more lucrative gaming facility without addressing, in consultation with other tribes the state and local governments, whether that facility could be "detrimental to the surrounding community"; and there will be no temporal connection whatsoever between the date of Redding's restoration and Redding's new, expanded gaming at the Strawberry Fields Site.

In short, Interior's current course under the MOU does damage to Congress's clear intent in IGRA to carefully circumscribe those settings in which a tribe might avoid the two-part determination process for taking lands into trust for gaming after IGRA's enactment. Restored tribes must proceed under the two-part determination, with the accountability to other tribal, state, and local governments that it requires, *unless* there is a true temporal connection between the land acquisition for gaming and the date of the tribe's restoration. DOI's current course would allow Redding to proceed without the requisite temporal connection in violation of IGRA.

T6-08
(Cont.)

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can either stop gaming upon applying to take the new lands into trust and entirely bypass the cumbersome and uncertain two-part determination process or it can continue with gaming and seek to have new lands taken into trust for gaming in accord with the two part-determination process.

C. THE STRAWBERRY FIELDS SITE DOES NOT QUALIFY FOR THE "RESTORED LANDS" EXCEPTION UNDER IGRA BECAUSE REDDING DOES NOT HAVE A SIGNIFICANT HISTORICAL CONNECTION TO THE SITE; THAT HISTORICAL CONNECTION BELONGS TO THE WINTU TRIBE.

As set forth above, to invoke the restored lands exception, Redding must demonstrate that it has a "significant historical connection" to Strawberry Fields. 25 C.F.R. § 292.12(b). It has no such historical connection.

The expert report of Theodoratus & McBride, attached hereto as Exhibit B, is incorporated herein by reference. Dr. Dorothea Theodoratus and Kathleen McBride, M.A., accumulate 80 years of experience in studying the indigenous peoples of northern California. *Id.* at 28; *see also id.* Addendum 1 (curriculum vitae of Theodoratus and McBride). They point out that the Redding Rancheria "is a 30 acre parcel of land that the United States purchased in 1922 to provide housing for 'homeless Indians' who travelled to the area as seasonal workers to work on the ranches and fruit farms." *Id.* a 1. The individuals who were encouraged by United States' agents to take up residency on this parcel "were of diverse backgrounds; they were not an identifiable indigenous tribe." *Id.* In fact, "they came from a range of identifiable indigenous tribes: Pit River, Wintun (Wintu and/or Nomlaki), Wailaki, Maidu, Paiute-Shoshone, Yana, Karuk, and Yurok." *Id.* The tribal affiliation of some of the earliest residents were Pit River, "a tribe indigenous to the Pit River area, 40-60 miles to the northeast of this 30 acre parcel." *Id.* *See also id.* at 23-28 (detailed examination of the history of the Redding Rancheria).

T6-09

Unlike other Rancherias in northern California, the Redding Rancheria "was not established for a specific native community in their own indigenous area." *Id.* at 2. It is "unique in its composition of a variety of indigenous peoples located for the purpose of

serving local agriculture." *Id.* Thus, *as a tribe*, the Redding Rancheria has an historical connection -- albeit, a "relatively modern one" -- only to the original Rancheria land that the United States purchased for individuals from a wide range of indigenous territories. *Id.* at 2-3, 28. As Theodoratus & McBride conclude:

> The Redding Rancheria, *qua tribe,* has a significant historical connection to only one site, the original 30 acres purchased by the United States for homeless Indians in 1922. Redding did not come into existence as an identifiable Indian tribal government until September 25, 1939. At that time, its historical relationship to any land was limited to that 30 acres, and that tribe-land relationship lasted only 19 years, until the Termination Act of 1958, beginning anew 26 years later (in 1984) with the settlement of the Hardwick case. *In short, the Rancheria's "historical" connection to any land is a relatively modern one, and it is restricted to the original 30 acre parcel upon which a variety of individuals from diverse indigenous backgrounds took up residence with encouragement from federal officials in the mid-1930s.*

Id. at 2 (emphasis added). *See also id.* at 23-28 (detailed examination of the history of the Redding Rancheria).

T6-09
(Cont.)

Strawberry Fields is, in fact, the aboriginal territory of the Wintu people, currently represented by three Wintu bands: the Wintu Tribe of Northern California, the Winnemem Wintu, and the Nor Rel Muk Wintu Nation (collectively the "Wintu Tribe" or the "Wintu"). *Id.* at 2, 4-19, which are currently seeking federal recognition.

> Unequivocal historical and archeological evidence demonstrates that the Strawberry Fields Site is the indigenous territory of the Wintu Tribe. The Wintu therefore have a significant and unique historical connection to the Strawberry Fields Site. The site and immediately adjacent lands is the location of six Wintu villages bordered by the Sacramento River to the west and Churn Creek to the east. These villages were in existence and occupied well into the 1800's. Between 760 and 950 Wintu resided within about 190 Wintu homes in these villages. These Wintu residents relied upon the salmon runs on the Sacramento River for their subsistence.

Id. at 2. *See also id.* at 4-23 (detailed examination of "The Indigenous History of the Strawberry Fields Site").

While some members of the Redding Rancheria may trace their ancestry to the Wintu and thereby claim, *as individuals*, that they have an historical connection to Strawberry Fields, *see id.* at 1, 25, 27-28 (noting that the Rancheria consists of descendants of Wintu and other tribes including, Pit River, Karuk, Yurok, and Yana), that cannot be the basis for the Rancheria, itself, *as a tribe*, to make such a claim. As Theodoratus & McBride establish, members of the Redding Rancheria trace their ancestry to a variety of indigenous peoples from various regions, including Pit River, Karuk, Yurok, and Paiute-Shoshone. *Id.* at 1, 25, 27-28. The Redding Rancheria, *as a tribe,* cannot validly claim that it has a significant historical connection to the territories of the Pit River, Karuk, Yurok, or Paiute-Shoshone tribes just because members of the Rancheria trace their ancestry to those tribes. It can no more do so with respect to Wintu territory just because members of the Rancheria trace their ancestry to the Wintu.[11]

T6-09 (Cont.)

The regulations state that "significant historical connection means . . . 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

[11] While the Wintu have yet to receive formal federal recognition, that does not affect the legitimacy of their well-documented significant historical connection to Strawberry Fields. *Cf. Joint Tribal Council of Passamaquoddy Tribe v. Morton,* 388 F. Supp. 649, 668 (D. Me.), *aff'd sub nom. Joint Tribal Council of the Passamaquoddy Tribe v. Morton,* 528 F.2d 370 (1st Cir. 1975) (aboriginal lands of a tribe not formally recognized can invoke protections under the Indian Nonintercourse Act of 1790, prohibiting land transactions with Indian tribes absent federal consent). Indeed, they are established tribal entities whose members have been eligible for BIA education funds, and they have entered into agreements with other United States agencies. *See Malone v. Bureau of Indian Affairs,* 38 F.3d 433 (9th Cir. 1994); *Winnemem Wintu Tribe v. U.S. Department of Interior,* 725 F.Supp.2d 1119 (E.D. Cal. 2010).

(emphasis added). The plain meaning of "vicinity" is "neighborhood." *See* WEBSTER'S SEVENTH NEW COLLEGIATE DICTIONARY (G & C Merriam Co., 1971) at 990. In the 2010 *DOI Restored Lands Decision*, Interior suggested that because the original 30 acre Rancheria is about two miles, as the crow flies, from Strawberry Fields, Redding has had a village and occupancy "in the vicinity" of Strawberry Fields. *See DOI Restored Lands Decision* at 6-7. *See also id.* at 6 (noting that Strawberry Fields is "about 3.7 miles by road" from the existing rancheria). This is a superficial reading of the phrase "in the vicinity." The Redding Rancheria is not in the "neighborhood" of the Strawberry Fields Site. Any ordinary neighborhood stands together in a far tighter radius than nearly two miles or a distance of 3.7 miles by road. More importantly, the bona fide indigenous occupant of Strawberry Fields is the Wintu Tribe, and it would be a tortured reading of the "in the vicinity" standard in this case to claim that the Redding Rancheria, not the Wintu Tribe, has the "significant historical connection" to Strawberry Fields just because Redding has, in relatively recent times, occupied land that is about 2 miles from Strawberry Fields.

T6-09 (Cont.)

D. 80 ACRES OF THE STRAWBERRY FIELDS SITE CANNOT BE USED FOR GAMING PURPOSES, AND THE TIMING OF REDDING'S APPLICATION TO TAKE THE ANDERSON SITE INTO TRUST SHOULD BE ADDRESSED.

Regardless of whether Redding can satisfy the "temporal connection" and "significant historical connection" requirements to establish that Strawberry Fields, as a whole, qualifies as "restored lands," 80 acres of the Strawberry Fields Site cannot so qualify. As set forth above, to meet the temporal connection requirement, a tribe must

T6-10

"submit[] an application to take the land into trust within 25 years after the tribe was restored to Federal recognition." 25 C.F.R. § 292.12(c)(2).

According to Interior, sometime prior to April 19, 2006, Redding filed such an application for 152 acres of the Strawberry Fields Site. *DOI Restored Lands Decision* at 2. But it did not submit an application to take an additional adjacent 80 acres into trust until July, 2010. *Id.* As set forth above, Redding was restored to federal recognition on June 11, 1984. Thus, the 25 year deadline expired on June 11, 2009, and Redding's application to take the additional 80 acres into trust fails to meet to requisite 25 year requirement. Thus, if DOI or its BIA were to conclude that the other 152 acres cleared the hurdles for the "temporal connection" and "significant historical connection" requirements, Redding is precluded from engaging in gaming-related activities on this 80 acres.

T6-10 (Cont.)

The DEIS does not address when Redding applied to take the Anderson Site into trust. That timing should be addressed, and for the same reasons, if that application was submitted to Interior after June 11, 2009, Redding must be precluded from engaging in gaming-related activities there.

T6-11

III. DOI LACKS AUTHORITY TO TAKE EITHER STRAWBERRY FIELDS OR THE ANDERSON SITE INTO TRUST UNDER THE INDIAN REORGANIZATION ACT.

A. THE REDDING RANCHERIA HAS NO NEED FOR ADDITIONAL TRUST LANDS

T6-12

The Agency invokes the Indian Reorganization Act (the "IRA") as authority to take the Strawberry Fields Site and the Anderson Site into trust. The Secretary of the Interior must consider "[t]he need of . . . the tribe for additional land." 25 C.F.R. §

151.10(b). The DEIS fails to engage in that consideration because it ignores over 63 acres of land that the United States took into trust for Redding on lands that are just over 1,000 feet from its pre-existing trust lands in March, 2019. That newly acquired land base is discussed in Section IV(A)(3), below, and that discussion is incorporated by reference herein. By ignoring this newly acquired land base of the Redding Rancheria, the DEIS fails to comply with the requirement of the IRA to accurately assess Redding's need for either the Strawberry Field Site or the Anderson Site.

Further, to the extent that the Agency presumes that Redding has a need to have the Strawberry Fields Site taken into trust because Strawberry Fields is within Redding's "traditional territory" or because Redding has a "significant historical connection" to Strawberry Fields, for the reasons set forth above in Section II(C), that view is erroneous. T6-12 (Cont.)

Finally, as set forth in Section IV(A)(1), below, the Agency's sole focus with respect to Redding's need to take either the Strawberry Fields Site or the Anderson Site into trust for Redding is maximization of governmental revenues through gaming, but Alternatives A, B, and C will not meet that need, and that need will best be met under a modified Alterative F, which requires no additional land. Thus, the DEIS assessment of "need" is inaccurate. The Band incorporates Section IV(A)(1) by reference herein.

IV. THE DEIS FAILS TO COMPORT WITH THE REQUIREMENTS OF THE NATIONAL ENVIRONMENTAL POLICY ACT.

A. THE ALTERNATIVES ANALYSIS IS DEFECTIVE.

The very "heart" of this Agency's NEPA analysis must be consideration of alternatives to the proposed action. 40 C.F.R. § 1502.14. Alternatives analysis begins with an assessment of purpose and need of the proposed project, which must be T6-13

reasonable. *See Central Sierra Environmental Resources Center v. United States Forest Service,* 916 F. Supp.2d 1078, 1088 (E.D. Cal. 2013). The BIA must then "[r]igorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14(a).

1. The Alternatives Analysis Fails To Rigorously Evaluate The Redding Rancheria's Need To Generate Governmental Revenues.

In Section 2.11.2 of the DEIS, the Agency concludes that "of the alternatives evaluated in this EIS, Alternative A would best meet the purposes and needs of the BIA for acquiring the Strawberry Fields Site in trust by . . . provid[ing] the Tribe with the best opportunity for securing a viable means of attracting and maintaining a long-term, sustainable revenue stream." DEIS at 2-53. At the same time, the DEIS makes clear that Alternative A presents the most significant environmental impacts of all of the alternatives. *See id*. *See also* DEIS Appendix K. The DEIS then ranks the Alternatives for the trust acquisition for gaming at Strawberry Fields on a "sliding scale." It ranks Alternatives B and C, each of which would have "fewer impacts" than Alternative A, lower than Alternative A because they "would not be the most efficient means of attracting and maintaining a long-term, sustainable revenue stream." DEIS at 2-53 – 2-54.

T6-13 (Cont.)

It is clear from the DEIS that the Agency has focused on the generation of revenue as the principal need for which the project is proposed. But the Agency fails to examine, in the first instance, the existence of such a need. Alternatives analysis begins with an accurate assessment of purpose and needs of the proposed project. *See Central Sierra Environmental Resources Center*, 916 F. Supp.2d at 1088. The DEIS fails in this regard because it fails to examine Redding's need for revenues through gaming. Moreover, a

rigorous examination of the revenues that Redding generates from its Win-River Resort Casino shows that those revenues are extremely robust; the need presumed in the DEIS is, therefore, illusory.

The Redding Rancheria already engages in highly successful Class III gaming at its existing Win-River Resort Casino, generating in the order of at least $15 million in tribal government revenues in 2017 and at least $22 million in per capita distributions for tribal members in that year, and there is no reason to doubt that these will continue well into the future. *See Global Market Advisors, 2017 Property Performance Estimate: Win-River Resort & Casino* (Updated June 2019) ("*GMA 2017 Win-River Performance Analysis*"), attached hereto as Exhibit H, at 1-3, 26-29. Global Market Advisors ("GMA"), a highly qualified gaming consulting firm with a team of seasoned experts with vast experience in assessing the performance and market feasibility of gaming facilities, has examined the performance of Redding's Win-River Resort & Casino to reach these conclusions. Its *GMA 2017 Win-River Performance Analysis* is incorporated herein by reference.

T6-13
(Cont.)

Given the lucrative earnings that Redding realizes from the Win-River Resort & Casino, and Redding's publicly announced allocations of proportions of gaming revenues to its 182 adult members and 156 minors, GMA estimates Redding provides each of its tribal members with approximately $67,668 per year. *Id.* at 3. When income per household is considered, average annual household income solely from tribal gaming revenue distributions is in the order of $115,035, "which is 75% greater than the Shasta County average." *Id.* Thus, "individual Redding Rancheria Tribal Members enjoy per

capita distributions that are well above the average annual household incomes for the area." *Id.*

The Redding Rancheria, therefore, is fully realizing the goals of IGRA: to enable tribes to generate revenues to support tribal governmental services for tribal members and realize economic self-sufficiency. Indeed, it is doing so well, that its tribal citizen enjoy incomes that are well above the average of those in the surrounding community. Thus, the assertion that there is a need for any of the proposed gaming alternatives to fulfill the purposes of IGRA is fundamentally flawed. The existing Win-River Resort & Casino fully fulfills that need. The DEIS's failure to assess the asserted need of Redding to realize revenue generation for governmental services renders the alternatives analysis defective.

T6-13 (Cont.)

2. If A Purpose Of The Project Is To Acquire Strawberry Fields In Trust For Redding Rancheria Because Strawberry Fields Is The "Traditional Territory" Of The Redding Rancheria, The Alternatives Analysis Is Defective Because Strawberry Fields Is Not Within The Traditional Territory Of Redding.

It is unclear whether the DEIS focuses on the assertion that the Strawberry Fields Site is "within the traditional territory of the Tribe" as a purpose or need to be fulfilled by the proposed alternatives. *Compare* DEIS at 1-2 (stating that an objective of the proposed action is to secure Strawberry Fields "which is in the traditional territory of the Tribe" for Redding) *and* DEIS at 2-53 – 2-54 (focusing solely on "revenue generation" as the purpose and need). Such a failure of specificity alone leaves the DEIS's alternatives analysis less than "rigorous." To the extent that the DEIS accepts an assertion that Strawberry Fields is "within the traditional territory of the Tribe" as a purpose or need for

T6-14

the proposed project, it is incorrect and renders the Agency's alternatives analysis erroneous.

As addressed in Section II(C), above, "the Redding Rancheria is unique in its composition of a variety of indigenous peoples located for the purpose of serving local agriculture." Theodoratus & McBride at 2. "Unlike other Rancherias in northern California, [Redding] was not established for a specific native community in their own indigenous area." *Id.* at 2. Thus, *as a tribe,* the Redding Rancheria has a traditional or historical connection to only one place: to the 30 acre parcel of land that the United States purchased in 1922 to provide housing for a disparate group of "'homeless Indians' who travelled to the area as seasonal workers to work on the ranches and fruit farms." *Id.* at 1-2. The Strawberry Fields Site is simply not the traditional territory of the Redding Rancheria. On the contrary, as also set forth in Section II(C), above, Strawberry Fields is the traditional territory of the Wintu: "[u]nequivocal historical and archeological evidence demonstrates that the Strawberry Fields Site is the indigenous territory of the Wintu Tribe." Theodoratus & McBride at 2-3, 4-19.

T6-14 (Cont.)

Thus, to the extent that the DEIS employs the idea that the Strawberry Fields Site is the traditional territory of the Redding Rancheria to define "need," it is erroneous. Strawberry Fields is the traditional territory of the Wintu; the Redding Rancheria's "traditional territory" is limited to the original 30 acres that the United States purchase for homeless Indians in 1922. *Id.* at 23-28. For further support, the discussion set forth in Section II(C), above, is incorporated herein by reference.

3. The Alternatives Analysis Is Defective Because It Provides No Specificity With Respect To Lands Needed For Additional Tribal Services And Housing, And Even If Such Specificity Were Provided, Three Reasonable Alternatives Must Be Considered.

The DEIS states that an objective of the project is provide for "additional tribal services and housing," DEIS at 1-2, but it fails to address, in any specific way, how much land Redding needs for those uses. There is no discussion of what tribal services are missing, how many housing units are needed, how much land any of those uses would occupy, or why they cannot be met on or near the Redding Rancheria's current trust lands. The DEIS comparison of alternatives makes no mention of "additional tribal services and housing" as a need to be fulfilled; the sole determining focus is on an alleged need for maximizing a revenue stream through gaming. *See* DEIS at 2-53 – 2-54. The DEIS's failure to provide any specificity for the asserted need for additional tribal service and housing renders it inadequate. T6-15

To the extent that such a need is given specificity and is reasonable (a conclusion that cannot be reached from the DEIS), then three reasonable alternatives should be considered: **(1) maintaining the Win-River Resort Casino as is – for it provides generous revenues to support the Rancheria's governmental services and per capita payments to tribal members – and using lands within or near the Rancheria's existing trust lands for specified tribal services and housing, (2) maintaining the Win-River Resort Casino as is and using the Anderson Site for specified tribal**

services and housing, (3) maintaining the Win-River Resort Casino as is and using Strawberry Fields for specified tribal services and housing.[12]

As the Ninth Circuit has made clear, "[t]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate." *Westlands Water Dist. v. U.S. Dept. of Interior,* 376 F.3d 853, 868 (9th Cir.2004) (quotations and citation omitted). *See also Strahan v. Linnon,* 967 F. Supp. 581, 602 (D. Mass. 1997), *aff'd,* 187 F.3d 623 (1st Cir. 1998) (The Agency has a "duty under NEPA . . . to study all alternatives that appear reasonable and appropriate for study at the time of drafting the EIS, as well as significant alternatives suggested by . . . the public during the comment period.").

With respect to the first unexamined alternative at issue -- continued operation of the Win-River Resort & Casino and using lands within or near the Rancheria's existing trust lands for specified tribal services and housing -- the Agency should account for the fact that as of March, 2019, the United States holds just over 63 acres of land in trust for Redding on lands that are just over 1,000 feet from its pre-existing trust lands. A full description of this land with confirming sources is attached hereto as Exhibit I. This would be a more than adequate land base for locating tribal administrative office and housing to the extent that such space is not available within the existing trust lands.

T6-15 (Cont.)

[12] To the extent that there is a specific need for additional tribal services and housing to be fulfilled by the project, the stated objective to locate them "on the current Rancheria," *see* DEIS at 1-2, is too narrow. *See Cachil Dehe Band of Wintun Indians of Colusa Indian Cmty. v. Zinke,* 889 F.3d 584, 603 (9th Cir. 2018) (the Agency cannot "define the project's objectives in terms so unreasonably narrow, that only one alternative would accomplish the goals of the project.").

4. Even If Redding Were In Need Of More Revenues From Gaming, The Alternatives Analysis Would Be Defective Because (1) It Wrongly Concludes That Alternatives A, B, And C Are Economically Viable, (2) It Fails To Examine A Modified Alternative F, Which Would Be More Economically Viable Than Alternatives A, B, C, Or the Current Alternative F, And (3) It Fails To Consider Three Additional Alternatives.

Even if Redding had a genuine need for more governmental revenues and per capita payouts to its tribal members than it is already realizing from the Win-River Resort Casino, the DEIS alternatives analysis is defective because (a) it wrongly concludes that Alternatives A, B, and C (the gaming alternatives at Strawberry Fields) would be economically viable and generate substantial revenues for the Redding Rancheria, and (b) it fails to consider a rational expansion of the Win-River Resort Casino, a modified version of "Alternative F," which would be the most effective and viable means for the Rancheria to generate additional revenues through gaming.

T6-16

GMA, who, as indicated above, have decades of expertise in the areas of gaming market assessments, feasibility studies, and economic impact studies, have examined the DEIS's assessment of the financial viability of Alternatives A, B, C, and F and found fundamental flaws in the analysis. As GMA states in its *Economic Return Evaluation of the Redding Rancheria Draft Environmental Impact Statement Alternatives: Review of Methodology, Reasonableness of Conclusions, and Analysis of a Modified "Alternative F"* (May, 2019) ("*GMA Economic Return Report*"), attached hereto as Exhibit J, which is incorporated into these Comments by reference, the DEIS financial return assessment of Alternatives A, B, and C is flawed by relying entirely upon incremental revenue projections. "This approach fails to address financing costs, operating and ongoing maintenance and capital expenses for the Alternatives and thus does not include an

estimate of return on investment or actual projected cash flow available to Redding Rancheria for each Alternative." *Id.* at 3.

The *GMA Economic Return Report* explains that the fundamentals necessary to properly measure revenue generation for Alternatives A, B, and C are missing from the DEIS: EBITDA (project earnings before interest, taxes, depreciation, and amortization) must be compared with development costs to properly assess financial feasibility. As GMA explains, incremental gaming revenues are

> [o]nly a first step in assessing economic return. A project with high gross revenues but low cash flow (whether due to high development costs, high operating expenses or both) obviously is neither preferable nor superior to a project with somewhat lower gross revenue but higher cash flow (whether due to lover development costs, lower operating expenses or both).

Id. at 4. To properly assess the financial viability of Alternatives A, B, and C, GMA prepared a proforma income statement analysis to project EBITDA for each alternative based upon the 2017 EBITDA in the *GMA 2017 Win-River Performance Analysis* (Exhibit H). *See GMA Economic Return Report* at 4. To then estimate a given project's economic feasibility and return, GMA compared EBITDA to development costs, a step that is completely missing from the DEIS. GMA explains:

T6-16
(Cont.)

> Typically, in the gaming industry, developments are not feasible when the multiple of EBTIDA to development cost is greater than 7.5. . . . Given development cost expectations in each alternative, the Strawberry Fields Site alternatives are expected to generate multiples of EBITDA to development cost between 9.9 and 10.3, *making Alternatives A, B, and C economically unfeasible.*

Id. at 4 (emphasis added). After accounting for reasonable interest rates for each project alternative to necessarily factor financing into the assessment, as well as additional maintenance expenses for each Alternative, which the DEIS completely overlooks, GMA

shows that the change in net operating income (NOI) to the Redding Rancheria *"will be negative* under Alternatives A, B, or C." *Id.* at 5.[13] Thus, even if the Redding Rancheria had need for more revenue through gaming than what it already derives from Win-River Resort & Casino, Alternatives A, B, and C would not meet those needs, and the DEIS is incorrect to conclude otherwise.

T6-16 (Cont.)

If Redding did, in fact, have need for more gaming revenues than what it currently realizes from the Win-River Resort & Casino, it could make improvements to that existing gaming establishment in a manner that varies from Alternative F to generate substantial revenues, but Alternative F, as presented in the DEIS, is unfeasible.

The flaws of Alternative F are self-evident for anyone familiar with casino resort design. As GMA, with significant expertise in this field, points out, the proposed location and design of a new parking garage and events center "defies the fundamental rules of sound casino design." *GMA Economic Return Report* at 18.

> Neither amenity is connected to the casino. Patrons attending a concert can walk directly from the events center to the parking garage without setting foot into the casino. Sound casino design calls for driving patrons from the garage through the casino and then to the events center and then forces customers to return to their cars taking the same path. This kind of design passively induces a portion of patrons to visit the casino and avail themselves of the various gaming and dining options. This is a fundamental design flaw with Alternative F and if built as currently planned, will not benefit the casino or its restaurants.

T6-17

Id. at 18-19. In addition, Alternative F does not propose any additional dining options. "Without compelling dining options, the casino will not be able to expand its reach from

[13] The failure of the DEIS to address whether, and if so, how, Redding Rancheria will fund the $165 to $198 million cost of the Strawberry Fields casino project is an extraordinary oversight. The financial viability of a project cannot possibly be assessed without accounting for the costs of financing. Conversely, if Redding has nearly $200 million in cash to finance the project on its own, this would further call into question the validity of a claim that Redding is in need of a new and expanded IGRA gaming facility to generate revenues.

its current mix of customers." *Id.* at 19. Finally, and emblematic of the lack of rigorous consideration of the alternatives, Alternative F fails to specify where the 250 additional gaming machines will be located. Presumably they would be located in a renovated area that currently houses the events center/bingo hall, but this would not be an economically optimal use of such an expansive space. *See id.* at 19.

The components of a far more rational renovation and upgrade of the Win-River Resort & Casino, a "modified Alternative F," as proposed by GMA, would consist of the following:

- Renovation of the existing casino floor.
- A major retrofitting of the existing air handling system in the casino in order to provide a quality indoor environment that is free of stale cigarette smoke.
- Demolition of the existing events center building to be replaced by a new two story structure. This new building would house the following amenities:
    - Two additional dining outlets including a brew pub and upscale dining outlet on the main level.
    - 6,000 square feet of gaming space, capable of accommodating 200 additional electronic gaming devices on the main level.
    - A dedicated 1,000-seat entertainment venue on the second level.
    - Seamless connectivity to the existing casino.
- A 1,000-space parking garage with a covered overhead walkway connecting to the casino, proximate to the porte cochere.
- No additional lodging capacity.

T6-17
(Cont.)

See GMA Economic Return Report at 20-21. GMA projects that this modified Alternative F could be accomplished at a cost of approximately $43 million. *See id.* at 22. Further, this modified Alternative F would generate substantial incremental gaming revenues, with positive incremental NOI in the order of $3.7 million. *Id.* at 5, 30-32. This means that

> Redding Rancheria will achieve a higher return on investment by expanding and repositioning the existing property for $43 million under the Modified Alternative F . . . than it would by spending $165 to $198 million on a new property at

> Strawberry Fields. GMA's Modified Alternative F is a clearly superior alternative to Alternatives A, B, & C considering the economic return to Redding Rancheria.

Id. at 5.

Given all of this, *if*, (a) contrary to the reality that the Redding Rancheria derives significant revenues from its existing IGRA gaming at the Win-River Resort & Casino – enough to provide incomes to tribal households well above the average in Shasta County – the asserted "need" for additional revenues were nevertheless presumed valid and (b) the Rancheria's asserted need for a location for "additional tribal services and housing" were specific and reasonable (a conclusion that does not flow from the DEIS as written), the following three alternatives, in addition to the three set forth above, should be fully considered: **(4) proceeding with improvements to the Win-River Resort Casino in accord with GMA's "modified Alternative F," and using lands within or near the Rancheria's existing trust lands for specified tribal services and housing, (5) proceeding with improvements to the Win-River Resort Casino in accord with GMA's "modified Alternative F," and using the Anderson Site for specified tribal services and housing, and (6) proceeding with improvements to the Win-River Resort Casino in accord with GMA's "modified Alternative F," and using Strawberry Fields for specified tribal services and housing.**

T6-17
(Cont.)

As noted above, "[t]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate." *Westlands Water Dist. v. U.S. Dept. of Interior,* 376 F.3d at 868.

With respect to the fourth unexamined alternative at issue – improving the Win-River Resort & Casino in accord with the modified Alternative F and using lands within

or near the Rancheria's existing trust lands for tribal services and housing – the Agency should account for the over 63 acres that the United States took into trust for the Rancheria in March, 2019, land that is just over 1,000 feet from Redding's existing trust lands. Again, a full description of this land with confirming sources is attached hereto as Exhibit I. As in the case of the first unexamined alternative discussed above, this land would be more than adequate for locating tribal administrative offices and housing to the extent that such space is not available within Redding's existing trust lands.

T6-17 (Cont.)

5. The Alternatives/Project Description Suffer Multiple Additional Defects.

As noted above, the description of the alternatives lays the foundation for the environmental analysis. Unfortunately, there are key elements which are not described adequately in the Alternatives section or the remainder of the DEIS. The inclusion of this information must be presented in a Revised or Supplemental DEIS.

To begin with, the "Background" section of the DEIS premises the entire analysis of the alternatives on a presumption that Redding lacks an adequate land base:

> Today, the Tribe owns 11 current Rancheria parcels comprising approximately 14.8 acres, 48 percent of the original Rancheria (8.51 acres of which are held in trust and 6.29 of which are held in fee by the Tribe). Of these, 6.9 acres are fully developed with the Win-River Casino; 6.34 acres are fully developed with Tribal administrative offices; 1.06 acres are developed with the Tribe's Head Start facility; and 0.5 acres consist of a historic burial ground.

T6-18

DEIS at 1-2. This fails to account for over 63 acres of land, within just over 1,000 feet from the existing lands of the Rancheria, which the United States took into trust in March, 2019. This oversight requires a complete reassessment of the Rancheria's need for land and any of the alternatives.

Beyond this, the following is a list of examples where the DEIS fails properly to assess environmental impacts of the alternatives, given the lack of defining details.

- There is little to no detail regarding the outdoor amphitheater in the Alternatives section, let alone the entirety of the DEIS. It is not labeled on the Site Plan (Figure 2-8). There is no discussion of the design, layout or configuration. There is no discussion of the times and frequency of use (e.g. times of day, per week/month/year). As a result, the DEIS cannot conclude that the effects of lighting, sound and vibration from the outdoor amphitheater on the surrounding community and biological resources, including on federally listed fish species and their Critical Habitat, will be less than significant with mitigation. Nor can the sufficiency of such mitigation be evaluated without this information. As this information is lacking, it is uncertain how the DEIS concludes that the amphitheater noise will be "temporary and intermittent" (pg. 4.11-9). T6-19

- The proposed stormwater pond, which is located in the floodplain, is not called out on the Site Plan (Figure 2-8), which furthers the confusion of whether or not the project affects the floodplain. It is shown in Appendix C; however, it should be fully disclosed and shown in the Alternatives section. The DEIS states many times throughout the document that there are no proposed facilities or development in the floodplain without clarifying that the proposed stormwater pond is located within the floodplain (examples include, but are not necessarily limited to, discussion on pgs. 2-11, 2-19, 4.3-2). This gives a false impression to reviewers that there is no impact on the floodplain and calls into question whether the impacts of the proposed stormwater facility and streambank armoring, both located within the floodplain, are adequately addressed. Furthermore, the proposed stormwater pond is identified by the DEIS as a mitigation measure that is intended to protect the ecology of the Sacramento River, including the federally listed fish species which inhabit it and their designated Critical Habitat. However, the DEIS admits that the stormwater pond may be inundated during high rain events—which would logically coincide with increased runoff. The DEIS nowhere analyzes the potential impacts of runoff during such events, including whether they could be accompanied by acute deliveries of contaminants known to be toxic to salmonids and other fish species. T6-20

- The proposed streambank armoring component is not shown on the Site Plan (Figure 2-8), nor could we locate an exhibit in the rest of the DEIS and appendices showing where streambank armoring would occur on the site. The streambank armoring component is not adequately described in the DEIS narrative discussion or the appendices. The Strawberry Fields Site borders the Sacramento River for approximately one mile. Does the project propose streambank armoring along one mile of the Sacramento River? There are too few details regarding this component of the project for it to be adequately analyzed in the DEIS. The design of the project calls for development close to an actively eroding streambank. This design choice and alternatives thereto are inadequately described or analyzed in light of T6-21

the very significant potential negative environmental consequences of armoring the streambank, generally, and the proposed method of doing so, specifically. The DEIS must look at alternative methods to stabilize the streambank. The proposed method of stabilization appears to be designed primarily to avoid Federal and State resource agency jurisdiction rather than reduce the environmental impacts of the stabilization or even to ensure its effectiveness.

T6-21 (Cont.)

- The proposed number of groundwater wells and exact location are not provided on the Site Plan (Figure 2-8). Throughout the DEIS, references to one well are interchangeably used with references to multiple wells. How can Water Supply Option 2 be assessed if the number of wells is unknown? Has on-site testing been conducted to determine if this Water Supply Option is viable? Has testing been conducted to determine if drawdown would affect the Sacramento River—including the protected fish species therein or their designated Critical Habitat—or surrounding wells?

T6-22

- The Alternatives section does not identify the location of the new off-site water and wastewater connections. They are later shown in Section 4.14; however, they should be fully disclosed and shown in the Alternatives section.

T6-23

- The DEIS improperly fails to separately analyze as alternatives the on-site and off-site water supply and wastewater disposal variants of Alternative A, Alternative B, Alternative C, Alternative D, and Alternative E. Whether water is supplied and wastewater disposed on-site or off-site substantially affects the environmental impact of the project. Thus, what is presented as five alternatives is actually eighteen alternatives, to whit:

    1. Alternative A, with Water Supply Option 1 and Wastewater Option 1;
    2. Alternative A, with Water Supply Option 2 and Wastewater Option 1;
    3. Alternative A, with Water Supply Option 1 and Wastewater Option 2;
    4. Alternative A, with Water Supply Option 2 and Wastewater Option 2;
    5. Alternative B, with Water Supply Option 1 and Wastewater Option 1;
    6. Alternative B, with Water Supply Option 2 and Wastewater Option 1;
    7. Alternative B, with Water Supply Option 1 and Wastewater Option 2;
    8. Alternative B, with Water Supply Option 2 and Wastewater Option 2;
    9. Alternative C, with Water Supply Option 1 and Wastewater Option 1;
    10. Alternative C, with Water Supply Option 2 and Wastewater Option 1;
    11. Alternative C, with Water Supply Option 1 and Wastewater Option 2;

T6-24

12. Alternative C, with Water Supply Option 2 and Wastewater Option 2;
13. Alternative D, with Water Supply Option 1 and Wastewater Option 1;
14. Alternative D, with Water Supply Option 2 and Wastewater Option 1;
15. Alternative D, with Water Supply Option 1 and Wastewater Option 2;
16. Alternative D, with Water Supply Option 2 and Wastewater Option 2;
17. Alternative E, with Water Supply Option 1; and
18. Alternative E, with Water Supply Option 2.

T6-24 (Cont.)

Each of these eighteen alternatives should be separately presented and analyzed.

- The Site Plan (Figure 2-8) fails to include and/or label the Events Center and proposed lift station. These facilities should be fully disclosed.
- With the exception of the hotel tower, the proposed height of structures are not stated. The assumptions used to evaluate visual impacts for the Strawberry Fields Site, which represents the gateway to the City of Redding, must be included.
- Site Access Options 1 and 2 would require widening and improvements to the existing bridge over the canal located just north of the Strawberry Fields Site on Bechelli Lane (pg. 2-15). The type of improvements are not disclosed and could have off-site environmental impacts.
- For the Anderson Site, the material borrow area and stormwater infiltration and storage facilities are not identified on the Site Plan (Figure 2-17).

T6-25

The Alternatives section describes that construction is estimated to commence in the summer of 2019 with full buildout occurring in 2025. It is clear this schedule cannot be met. The DEIS needs to be updated with realistic construction assumptions throughout the document. Revisions to the construction and opening date will affect air quality and traffic modeling which are specific to year.

T6-26

The DEIS includes a number of best management practices (BMPs) in Table 2-2. How will these measures be monitored and enforced? If they cannot be enforced the DEIS analysis should include these as mitigation measures rather than project design features.

T6-27

Under Alternatives A, B, C and E, the DEIS Alternatives section states that the existing Win-River Casino would be used for tribal services and housing with **NO** exterior improvements and the potential for interior improvements. Logically, the conversion of a casino to any other use would require both exterior and interior improvements which have not been analyzed in the document. T6-28

Besides the existing Win-River location, the BIA fully evaluates only two sites, one of which is adjacent to the Sacramento River and both of which are located in floodplains. Alternative sites outside of a floodplain must be evaluated consistent with NEPA regulations and Executive Order 11988 Floodplain Management. T6-29

B. THE DEIS IS DEFICIENT IN OTHER MULTIPLE RESPECTS.

The Band addresses additional DEIS defects by specific category as follows:

1. Agency Review/Expert Consultation

As stated in NEPA regulations "[a]ccurate scientific analysis, *expert agency comments*, and public scrutiny are essential to implementing NEPA (40 CFR §1500.1(b)) (emphasis added). The DEIS is missing any indication of whether consultation has occurred with relevant agencies with expertise in areas where the project will result in environmental impacts. These agencies include the U.S. Fish and Wildlife Service (USFWS), the National Marine Fisheries Services (NMFS), the Advisory Council on Historic Preservation, the State Historic Preservation Office (SHPO), the California Department of Water Resources, the Central Valley Flood Protection Board, the Federal Emergency Management Agency (FEMA), the California State Lands Commission and the California Department of Fish and Wildlife (CDFW), several of whom indicated T6-30

substantial concerns regarding the project during the scoping period. No correspondence is provided with these agencies nor are they listed in Section 6.3.

T6-30 (Cont.)

It is unclear whether the Biological Assessments prepared for the project have been sent to USFWS and NMFS and whether they concur with their findings. We are particularly concerned with impacts to Critical Habitat for federally listed fish species, including for federally listed fish species, including impacts from streambank armoring and impacts from noise, vibration, lighting, and runoff. As the stormwater facilities, potential onsite wells, potential onsite wastewater disposal facilities, and streambank armoring are not adequately described in the DEIS or BAs, the agencies should be consulted specifically on these components.

T6-31

The Central Valley Flood Protection Board (CVFPB), CDFW and California State Lands Commission jurisdictional boundaries are vaguely described and should be shown on an exhibit in the DEIS so that the full jurisdictional ramifications can be assessed (pg. 3.3-8). Placing the site into trust will create an inconsistent landscape for enforcement of beneficial state and federal environmental laws which protect the Sacramento River. For example, the Tribe is subject to all federal permitting requirements that also encompass state permitting procedures but may claim to be exempt from the CVFPB permits for activities on tribal trust lands.

T6-32

The BIA and Redding Rancheria are not exempt from compliance with the National Flood Insurance Program ("NFIP") regulations. The National Flood Insurance Act ("NFIA") applies to all participating communities within the National Flood Insurance Program ("NFIP") Community Rating System. The proposed project site and

T6-33

alternative site are located within Shasta County, a participating community in the NFIP Community Rating System. See FEMA Community Status Book Report – California as of 5/14/2019. Redding Rancheria has no Tribal law regulating floodplain development and is not a participating community independent of Shasta County. Therefore, both project sites are subject to the federal jurisdiction of the Federal Insurance Administrator of Shasta County. The *Draft Grading and Drainage Study* incorrectly states that "the development site is entirely out of the FEMA 100-year floodplain and the soil removal will not change the FEMA 100-year flood delineation." *Draft Grading and Drainage Study,* at 6 (Feb. 2018). Due to the fact the proposed casino will implement a streambank stabilization project within the Regulatory Floodway of the Sacramento River and also alter the drainage course and base flood elevation ("BFE") of the AE 100-year floodplain under proposed project site Alternatives A through E, through the placement of engineered fill, this project must comply with federal Floodplain Management Criteria for Flood-Prone Areas. *See* 44 CFR § 60.3. Specifically, under 44 CFR § 60.3(f), which incorporates (a), (b), (c) and (d) by reference, a Floodplain Development Permit is required for all proposed development within the AE zone and encroachments in the Regulatory Floodway are prohibited including fill, new construction, substantial improvements, and other development. Thus, in order to comply with NFIP regulations the BIA or Redding Rancheria must apply and obtain a Floodplain Development Permit from the Federal Insurance Administrator of Shasta County. Furthermore, under 44 CFR § 60.3 (a), prior to issuing a Floodplain Development Permit, the Administrator must determine that an applicant has obtained all necessary federal and state permits related to

T6-33 (Cont.)

the development. The most commonly required federal permits are wetlands permits under Section 404 of the Clean Water Act and incidental take permits under Sections 7 and 10 of the Endangered Species Act. In addition, a Conditional Letter of Map Revision ("CLOMR") letter from FEMA is necessary to determine whether the casino project, if built as proposed under either Alternatives A through E, would be compliant with applicable National Flood Insurance Program ("NFIP") regulations or would result in modification of the Base Flood Elevation ("BFE"), the Significant Flood Hazard Area ("SFHA"), or other flood hazard data depicted on a Flood Insurance Rate Map ("FIRM"). *See* National Flood Insurance Act ("NFIA"), 42 U.S.C. § 4001 et seq.; 44 CFR § 72.2.

T6-33 (Cont.)

2. Water Resources

The Water Resources section of the DEIS should include a watershed map so that the hydrologic connection to off-site areas is adequately disclosed and analyzed. Without disclosure of such information or provision of that analysis, it is not possible to accurately assess the potential environmental impacts of the project, including without limitation the impacts of the proposal to supply water from onsite wells or the proposal to dispose wastewater via onsite facilities. For example, there is no analysis or way to determine from the DEIS to what extent supplying water through onsite wells would result in lower recharge rates for portions of the Sacramento River bordering the Strawberry Fields or the impact that this would have on the river's ecology, including the Critical Habitat of listed fish species. This should be examined along with whether such impacts would differ depending on the time of year, as the four federally listed salmonid evolutionarily significant units (ESUs) use the portions of the Sacramento River

T6-34

bordering the Strawberry Fields for different lifecycle purposes and during different parts of the year. Similarly, there is no analysis or way to determine from the DEIS to what extent the proposal to dispose of wastewater onsite could negatively affect portions of the Sacramento River bordering the Strawberry Fields or the impact that this would have on its ecology including the Critical Habitat of listed fish species. This, as well, should be done in a manner that takes into account seasonal variations.

T6-34 (Cont.)

The Water Resource section also fails to analyze or provide information to determine the extent to which the proposed on-site water supply or proposed on-site waste water disposal would impact either the seasonal wetlands or the two ponds located on the Strawberry Fields Site. This information should be disclosed and these impacts analyzed, including the potential impacts on listed amphibians, and such an analysis should include seasonal variations.

T6-35

The Water Resources section fails to analyze the potential impact that the onsite water supply proposal could have on other users of the Enterprise Anderson groundwater subbasin, when combined with the groundwater management plan that the Enterprise Anderson Groundwater Sustainability Agency plans to release on January 1, 2022. If either the Strawberry Fields Site or Anderson Site is taken into trust, it will be outside the jurisdiction of the Enterprise Anderson Groundwater Sustainability Agency and any groundwater management plan it enacts. The DEIS should examine the extent to which, in that context, supplying the water for the project through onsite wells would impact other users subject to the plan, including the extent to which such users would be required

T6-36

to conserve more water than they would otherwise have to if the project's groundwater use was subject to the plan, and this analysis should include any seasonal variations. T6-36 (Cont.)

All of the foregoing analyses should, furthermore, take into account differences in impact arising out of whether just the onsite water supply option, just the onsite wastewater disposal option, or both are chosen and which of the alternatives they are associated with. T6-37

As noted above, the DEIS states many times that there are no proposed facilities or development in the floodplain without clarifying that the proposed stormwater pond and streambank armoring facilities are located in the floodplain. The effects of the locating these facilities within the floodplain must be analyzed but is not.

The DEIS assumes that the alternatives on the Strawberry Fields Site would not have flooding impacts because there is a balance of cut and fill onsite. Balancing cut and fill quantities onsite does not guarantee that there will be no impacts to drainage patterns or flooding. Many projects with a site balance or net cut are still required to consult with FEMA due to the interaction with the floodplain/floodway. T6-38

The proposed streambank armoring, only above the ordinary high water mark (OHWM), is unusual and not likely to be structurally stable; thus, unless the proposal to develop the Strawberry Fields Site is abandoned, alternative streambank stabilization solutions should be considered. The DEIS does not describe that as the streambank erodes, the boulders placed as part of the armoring will be launched off-site towards the Sacramento River. Using this method, the distribution of the boulders onto the streambank cannot be controlled; and the potential impact of this lack of control is neither T6-39

described nor analyzed. The DEIS also does not describe the impacts that the proposed streambank armoring would have on gravel delivery or the impact that this would have on downstream habitat in the Sacramento River, including Critical Habitat of listed salmonids.

T6-39 (Cont.)

For Alternative E, the Anderson Site is located almost entirely within the floodplain. The mitigation states that a map amendment will be filed with FEMA. This is inadequate and could cause changes to drainage or flooding in other areas without further analysis. The DEIS states that impacts will be less-than-significant due to balanced cut and fill and filing of a Letter of Map Revision with the Federal Emergency Management Agency. This is not an adequate analysis or mitigation. It is possible for projects with balanced cut and fill to change flooding and drainage patterns – particularly a project which admittedly fills 36 acre feet of existing 100-year floodplain storage capacity on the site.

T6-40

The DEIS *Draft Grading and Drainage Study* states the study did not conduct site specific measurements to determine the Base Flood Elevation ("BFE") and instead relied on an Army Corps of Engineers study from 2002 and FEMA Flood Insurance Rate Maps ("FIRMs") from 2011. FEMA creates and maintains FIRMs, of any area that is subject to naturally occurring floods. *See* 42 U.S.C. § 4101(a). These maps categorize flood-prone areas into different risk zones based on the severity of the flooding to which the area is susceptible and establish the "base flood elevation"—that is, the measure of how high flood waters are expected to rise in a flood of a certain likelihood (the "base" flood)—for these areas. The FIRMs are then used to assess premiums for flood insurance

T6-41

policies regulated by the National Flood Insurance Program (NFIP). FEMA is required to update these maps every five years, 42 U.S.C. § 4101(e),

> Once during each 5-year period (the 1st such period beginning on September 23, 1994) or more often as the Administrator determines necessary, the Administrator shall assess the need to revise and update all floodplain areas and risk zones identified, delineated, or established under this section, based on an analysis of all natural hazards affecting flood risks.

The last time the FIRM was updated for Shasta County was March 17, 2011 therefore, at a minimum FEMA must recalculate the BFE and reassess the risk zones for the proposed project sites in Alternatives A through E.

T6-41 (Cont.)

The increased amount of impervious surfaces in the floodplain will affect the physiology and behavior of organisms including endangered species within the Sacramento River. The DEIS does not address threats to water quality and aquatic habitats of the Sacramento River from thermal loading due to the loss of riparian vegetation. The temperature regime of this portion of the Sacramento River must be investigated to describe both the transport and decay of waste heat over time.

T6-42

3. Air Quality

The DEIS Affected Environment discussion should acknowledge that Shasta County is not in attainment with the State of California ozone standard (pg. 3.4-5).

The DEIS analysis should discuss that the Shasta County Air Quality Management District (SHAQMD) has established Level A and Level B thresholds of significance for addressing state ozone non-attainment (pg. 3.4-5).

T6-43

The DEIS text states that "[d]ue to the controversy surrounding [diesel particulate matter or DPM], an assessment of the potential impacts of DPM releases associated with

the Proposed Project has been included in Section 4.4" (pg. 3.4-9). Other than a reference to proposed BMPs, no actual analysis of DPM is provided in Section 4.4.

The DEIS states that "emissions resulting from the off-site access improvements are compared to SHAQMD emission thresholds" (pg. 4.4-1); however, no such analysis is provided in Section 4.4 or Section 4.14, nor are the thresholds ever acknowledged. The discussion of indirect air quality impacts from off-site improvements in Section 4.14 lacks quantitative analysis or comparison to SHAQMD thresholds.

The analysis identifies that emissions were calculated using the United States Environmental Protection Agency (USEPA) approved 2016 California Emissions Estimator Model, Version 2016.3.1 (CalEEMod, 2016; pg. 4.4-2). CalEEMod output sheets in Appendix I indicate that the model was run on July of 2018. However, the California Air Pollution Control Officers Association (CAPCOA) released an update to this model in October of 2017 (Versions 2016.3.2) which revised several bugs in the 2016.3.1 version.

T6-43 (Cont.)

The text indicates that a 30% trip reduction was used to adjust the trip rates to account for use events and conferences (pg. 4.4-2 and 4.4-3). Is this assumption consistent with the traffic analysis? It does not appear to be discussed in the methodology of the traffic section (pg. 4.8-3).

Substantial evidence should be provided here to support the contention that BMPs would be sufficient to avoid localized DPM impacts from construction (pg. 4.4-5).

The analysis finds that emissions of individual criteria pollutants from stationary sources would exceed the Tribal NSR threshold of two tons per year for reactive organic

gases (ROG; pg. 4.4-7); however, no mitigation is offered to reduce these emissions to below the threshold. We believe that as Shasta County is an ozone attainment area with respect to federal standards, the applicable threshold to be applied would be 5 tons per year of ROG. T6-43 (Cont.)

Regarding CalEEMod Output, the analysis of construction impacts does not include the construction of parking areas (see CalEEMod Users Guide Page 20). It also appears that the default construction phases have been substantially shortened to reflect the proposed project schedule. The additional equipment to achieve this condensed schedule need to be added to the equipment inventory (see CalEEMod User tip #20). T6-44

4. Biological Resources

The USFWS species list, California Native Plant Society (CNPS) rare plant list and California Natural Diversity Database (CNDDB) covered only one quad and are dated from 2017. These searches are only valid for up to six months, and should be updated for 2019. Additionally, the CNPS list and CNDDB list should include the surrounding 8 quads for a standard 9-quad search area. T6-45

The Affected Environmental section should be updated to include a formal wetland delineation verified by the U.S. Army Corps of Engineers. A map of the ordinary high water mark along the Sacramento River in relationship to the property boundary must be included to evaluate the potential impacts and agency jurisdiction associated with proposed streambank improvements. T6-46

We are concerned that the analysis of impacts to biological impacts does not consider potential impacts from proposed stormwater facilities and streambank armoring located within the floodplain. The analysis concludes that habitat for several species T6-47

would be avoided; however, these facilities are not identified on project figures. The impact analysis should include a habitat map with an overlay of all areas that would be disturbed to support the section's conclusions.

T6-47 (Cont.)

The project contains habitat and is located adjacent to Critical Habitat for federally-listed steelhead and Chinook ESUs, but does not adequately analyze the potential impacts on such protected fish or their Critical Habitat. The project proposes streambank armoring which could result in impacts from construction activities, improper installation or design, uncontrolled boulder launching, and changes in gravel production. The effects of lighting, noise, and vibration from the construction activities and the development (including an outdoor amphitheater and loading dock near the river's edge) on fish and wildlife have not been analyzed, with the exception of lighting impacts to birds. Indeed, the DEIS fails to even identify fish and wildlife as a sensitive receptor for vibration or noise. The DEIS also fails to describe or analyze the extent to which the project would result in increased deliveries of polyaromatic hydrocarbons or copper into salmonid habitat in the Sacramento River, resulting from the conversion of open fields to parking lots, also have not been analyzed, or the impacts there of. Further, as indicated above, the effects of the onsite water supply and onsite wastewater disposal options, separately and in combination, on listed fish species and their Critical Habitat should be analyzed.

T6-48

Appendix D to the DEIS admits that bank swallows inhabit the Strawberry Fields Site and, in particular, its northwest corner. That appears to correlate with the location of

T6-49

the planned streambank armoring; however the DEIS does not analyze the impact of such armoring on this state list species. T6-49 (Cont.)

The biological survey report indicates that protocol level rare plant surveys were done for a single season in 2007. Updated surveys should be conducted during the suitable blooming period for the plants with potential to be present. T6-50

Additional detail regarding species surveys for California red-legged frog (CRLF), foothill yellow-legged frog and western spadefoot toad (methods and timing) should be disclosed in Section 3.5 to ensure that surveys were conducted appropriately to observe the species. Further, as indicated above, the effects of the onsite water supply and onsite wastewater disposal options, separately and in combination, on these species should be analyzed. T6-51

The biological surveys identifying elderberry shrubs (habitat for valley elderberry longhorn beetle or VELB) date from 2016 and 2017. These surveys found only one shrub, though earlier surveys had identified 13 with evidence of VELB inhabitation. Conservation measures for VELB in Mitigation Measure 5.5-1 should include a new survey of the project area prior to start of construction, to identify any additional shrubs. Conservation measures should include protection for all newly identified shrubs in addition to the known shrub in the northwestern portion of the site. T6-52

Regarding Mitigation Measure 5.5-1, the habitat assessment survey for CRLF is not a protocol survey and is unlikely to detect the species. The purpose of the survey would be to identify suitable habitat for the species and to isolate this habitat from the construction disturbance area using barrier fencing. A qualified biologist should conduct T6-53

spot checks during construction to ensure the fencing is adequately maintained throughout construction.

T6-53 (Cont.)

Mitigation Measure 5.5-3 states "[s]tandard precautions shall be employed by the construction contractor to prevent the accidental release of fuel, oil, lubricant, or other hazardous materials associated with construction activities into jurisdictional features." The term "standard precautions" needs to be defined.

T6-54

5. Cultural Resources

As discussed under Agency Consultation/Expert Review above, the DEIS does not state whether the BIA has consulted with the California State Historic Preservation Office (the "SHPO") regarding the project. No consultation history or correspondence with the SHPO is included within the DEIS. As set forth in more detail below, the Strawberry Fields Site together with adjacent areas (the proposed North Access Improvement Area and the South Access Improvement Area) contain known resources and have a very high potential for National Register eligible subsurface resources. The expert opinion of this agency should be made available for public review. An EIS reader should be able to review the SHPO's determination of the eligibility of known resources and recommended measures for previously undiscovered resources, as they may disagree entirely with the findings of the DEIS.

T6-55

The description of the "area of potential effect" or APE is vague and should be clearly identified on an exhibit of the document so that meaningful input can be provided. The description of the APE for off-site improvements is similarly vague and should be shown on an exhibit. Correspondence with SHPO should be provided to confirm that the APE has been appropriately defined.

T6-56

No construction worker awareness training, archaeological monitoring or Native American monitoring has been proposed as mitigation for the project or alternatives with the exception of monitoring for the North Access Improvement Area APE. These measures must be included mitigate potentially significant impacts. T6-57

Mitigation language such as "it is anticipated that such measures would include development and implementation of archaeological and burial treatment plans" is non-committal and would not ensure that impacts from the project or alternatives are reduced to a less-than-significant level. T6-58

A Memorandum of Agreement or Programmatic Agreement would be appropriate given the importance of potential on-site resources. Neighboring Tribes, including the Band and the Wintu (see below), should be included in such agreements and consulted as interested parties as required by the National Historic Preservation Act (NHPA). Mitigation measures incorporated into the Record of Decision without such agreements are unlikely to reduce the impacts to a less-than-significant level. The USACE and FEMA should also be consulted as part of any agreement, as these agencies would need to comply with the NHPA for their approvals. T6-59

An archaeological survey was conducted of the Anderson Site; however, no cultural report is cited. It appears the Anderson Site not been given an equal level of analysis as the Strawberry Fields Site. The context and potential for cultural resources at this site is unknown and should be disclosed in the DEIS. T6-60

The reports referenced as AES 2016a, AES 2016b and AES 2017 are not available at the Northeast Information Center (NEIC). Not submitting these reports to the NEIC in T6-61

a timely manner is a violation of the CHRIS Information Access and Use Agreement (Part 6(E)).

T6-61 (Cont.)

The EIS provides little to no background or context for cultural resources, leaving the DEIS without an inadequate baseline. Information is severely lacking regarding the potential sensitivity for subsurface resources. The report of Theodoratus & McBride, attached hereto as Exhibit B, shows that the DEIS fails to consider or include readily available information and thus does not take a *hard look* at the potential environmental effects of the action.

Cultural and historic resources and related tribal interests that are wholly overlooked in the DEIS are set forth in Theodoratus & McBride at 4-19 ("The Indigenous History of the Strawberry Fields Site") and include the following:

The Strawberry Fields Site and adjacent lands and waters constitute the indigenous territory of the Wintu people, today represented by the Wintu Tribe of Northern California, the Winnemem Wintu, and the Nor Rel Muk Wintu Nation (collectively the "Wintu Tribe" or the "Wintu"). *See* Theodoratus & McBride at 4-19. The area was also regularly frequented by the Nomlaki, today represented by the Band, the indigenous occupants of lands just to the south of the Wintu's aboriginal territory encompassing Strawberry Fields. *See id.* at 3 ("The Nomlaki people, indigenous to lands south of Strawberry Fields, regularly migrated to the Strawberry Fields Site to take part in the salmon harvest and to engage in economic activities with the Wintu residents.") Thus, as explained further, the Band and the Wintu have significant interests in the protection of cultural and historic resources at Strawberry Fields an in the lands to be significantly

T6-62

impacted by the proposed North Access Improvement Area and South Access Improvement Area.

T6-62 (Cont.)

The DEIS at page 4.6-2, identifies an historic Wintu village CA-SHA-266, known as *Yonotŭmnomsono*, within the North Access Improvement Area. The DEIS recognizes that this site is eligible for listing in the National Register of Historic Places and that the project "will adversely affect" it.

Yonotŭmnomsono CA-SHA-266 (a former Wintu village of approximately 30 houses) is the northern most village of a string of six adjacent Wintu villages that extends through the Strawberry Fields Site to the south. *See* Theodoratus & McBride at 4-19. The six village chain running to the south of *Yonotŭmnomsono* consists of *Kĕ'nkodi* CA-SHA-268 (a former Wintu village of approximately 35 houses), *Nosono* (a former Wintu village of approximately 40 houses), *Kentiqĕ'ril* (a former Wintu village of approximately 25 houses), *Tcakkópûs* (a former Wintu village of approximately 10 houses), and *Nomdaltopi* (a former Wintu village of approximately 50 houses). *See id.* at 9, 19. The Wintu indigenous residents of these villages at the Strawberry Fields Site and adjacent lands relied upon the salmon runs on the Sacramento River for their subsistence. *Id.* These villages were in existence and occupied well into the 1800's by between 760 and 950 Wintu until epidemics of foreign diseases and a genocidal campaign, commenced by the brutal massacre of up to 1,000 Native peoples carried out in 1846 by John Fremont and his forces just south of Strawberry Fields, devastated the Wintu people. *See* Theodoratus & McBride at 4-21.

T6-63

The Nomlaki ancestors of the present day Paskenta Band of Nomlaki Indians frequented these Wintu villages at the Strawberry Fields Site to take part in salmon harvesting twice a year. *See* Theodoratus & McBride at 9, 12. There were "particularly close social relationship[s] between" the Wintu of this area and the Nomlaki. *Id.* at 12. Given this significant historic interaction of Nomlaki and with the Wintu of this area, Nomlaki ancestors of the Band may well have perished alongside Wintu in the Fremont massacre. *Id.* at 3.

Thus, the interests of the Band are very much allied with those the Wintu in protecting the cultural and historic resources that will be impacted by the proposed project at Strawberry Fields. As Theodoratus & McBride explain:

> These documented Wintu villages warrant a cultural resources study that assesses their eligibility for inclusion in the National Register under both criterion A and criterion D [of the NHPA] as a Wintu Cultural Landscape. The estimated length of occupancy, the seasonal, inter-tribal activities carried out in a unique river configuration exceptionally suited to the salmon harvest, and the shared history of assault and attempted annihilation of the entire community contribute to the historical significance of this cluster of villages on the Sacramento River. It is a shared indigenous history of the Wintu and their nearest neighbors to the south, the Nomlaki, and embodies their shared heritage values.

T6-63
(Cont.)

Id. at 4.

That such important cultural and historical resources likely face significant impacts from the proposed project is clear. The northern part of Strawberry Fields, the construction site for the proposed project, is located between the Sacramento River and a bend in Churn Creek where that bend comes closest to the Sacramento River. *See* DEIS Figure 2-2. This is the same location of *Nosono*, but may also include *Kĕ'nkodi* CA-SHA-268 because the latter is just south *Yonotŭmnomsono* and *Yonotŭmnomsono* is at the northern entrance of the construction site. *See* Theodoratus & McBride at 8-19. The

proposed Waste Water Leach Field and the South Access Road improvements are likely to significantly impact these and/or other villages in the string as well. *Id.* at 15-19.

Every Wintu village in this six village string should be eligible for listing in the National Register of Historic Places for the same reasons that the northernmost village, *Yonotŭmnomsono*, is eligible for that listing; each has essentially the same history. *See* Theodoratus & McBride at 15. Further, the fact that Strawberry Fields or lands adjacent to it at the southern end of the are associated with one of largest massacres of indigenous people in American history, in which up to 1,000 Native people (mostly women and children) perished, *see* Theodoratus & McBride at 20-21, should likewise warrant listing the entire site in the National Register of Historic Places. The lands and riverbed and banks adjacent to it, likely contain the remains of Wintu and Nomlaki people who perished in this massacre.

T6-63 (Cont.)

6. Socioeconomic Conditions.

The DEIS does not rely on the most current available information. Despite a publication date of April 2019, the DEIS relies on outdated information from the U.S. Census Bureau, citing the 2011-2015 American Community Survey (ACS) 5-year estimates throughout Section 3.7. As of December 6, 2018, 5-year data for the 2013-2017 survey were available on American FactFinder (census.gov).[14] Even if the document were drafted earlier in 2018, the 2012-2016 survey data was available as of December 7,

T6-64

[14] U.S. Census Bureau, 2018. Data Releases, 2017. https://www.census.gov/programs-surveys/acs/news/data-releases.2017.html

2017.[15] In the case of this 2019 DEIS, about 40% of the ACS data relied on is from 2011 and 2012 (7 to 8 years old). This renders statements on DEIS pages 3.7-2 and 3.7-8 regarding the use of the most current available data incorrect. ACS data should be updated to at least reflect the 2013-2017 survey, and if a revision is released after December 2019, the 2014-2018 survey should be reflected.

T6-64 (Cont.)

The DEIS incorrectly concludes that there are no low-income populations in the study area, resulting in an inadequate baseline. The DEIS' "primary method" for identifying low-income populations relies on unsupported and incorrect methods, and as a result the DEIS fails to analyze impacts on local populations that would be identified as low-income using accurate and accepted means. Table 3.7-4 identifies median household income and average household size for the geographies evaluated, and provides a "poverty threshold" number for each. The number is the same for each – $20,900 – ostensibly based on a household size of three people, as the table note indicates "[f]or poverty threshold calculations, average household size was conservatively rounded up to the nearest whole number of people." This is an erroneous understanding and application of the federal poverty guidelines, as explained below.

T6-65

Although the DEIS refers to environmental justice guidance from the CEQ and USEPA, the interpretation of that guidance is faulty. On page 3.7-10, the DEIS states, "[a] low-income community is defined as a Census tract where the median household income falls below the poverty limit" and goes on to state that Table 3.7-4 shows that the median household income of each Census tract was greater than the listed threshold, and

[15] U.S. Census Bureau, 2017. Data Releases, 2016. https://www.census.gov/programs-surveys/acs/news/data-releases.2016.html.

therefore, no low-income communities have been identified in the vicinity of the alternative sites. On page 3.7-8, the DEIS claims that the guidance from CEQ (1997)[16] and USEPA (1998) supports this approach; however, this is incorrect. Nowhere does CEQ's 1997 guidance or USEPA's 1998 guidance recommend comparing the median household income for a Census tract to "the poverty line" (which, as established in the following paragraph, is not a "line" but a set of values that vary by family size).

The Federal poverty guidelines have been misinterpreted by the DEIS. The federal poverty guidelines cannot be aggregated and compared to median household income for a given population; rather, they apply specifically to *each* family/household based on its size. For example, in 2019, a five-person family/household is assigned a threshold of $30,170.[17] In the ACS, the U.S. Census Bureau collects data on family and household income as well as size, and uses the data to report numerous estimates of poverty status available on several product tables, for example:

T6-65 (Cont.)

- Table DP03, Selected Economic Characteristics
  - Percentage of families and people whose income in the past 12 months is below the poverty level
  - This form also reports median household income as cited in the Draft EIS; however, it appears that the Draft EIS author referenced Table B19013
- Table S1701, Poverty Status in the Past 12 Months
  - Number and percent of people with family incomes below poverty level
  - Number and percent of people with family incomes below poverty level by sex, race, educational attainment, and employment status
- Table S1702, Poverty Status in the Past 12 Months of Families
  - Number and percent of families with incomes below poverty level (total)
  - Number and percent of families with incomes below poverty level by family size

[16] CEQ, 1997. Environmental Justice Guidance Under the National Environmental Policy Act.

[17] HHS, 2019. https://aspe.hhs.gov/poverty-guidelines, accessed May 20, 2019.

- Number and percent of families with incomes below specified poverty ratios (e.g., 200% of poverty level based on family size)

It is mathematically incorrect to use median income to assess poverty status. A median represents the midpoint of values: half are at or above the median value, and half are at or below it. Thus, in order to use this method, putting aside the erroneous use of a single poverty threshold to evaluate families and households of varying sizes, a population would have to have *at least* 50% of households with incomes below the chosen poverty threshold. This would represent an extreme case of widespread poverty in a community – for context, of the 8,057 census tracts in the State of California, in only 40 (less than one half of one percent of all census tracts) do more than 50% of families have incomes below poverty.[18] No such census tracts are located within Shasta County. Therefore, using this method *it would be impossible* to identify low-income communities in the study area. This approach is impermissibly narrow and is not consistent with CEQ and USEPA guidance or accepted practice.

T6-65 (Cont.)

The DEIS uses an inadequate baseline for environmental justice impacts. As revealed by the above explanations of poverty guidelines and mathematical concepts, the analysis in the DEIS is based on an incorrect interpretation of the affected environment that does not acknowledge the difference in poverty status among study area census tracts. For example, the 2013-2017 ACS reports that, compared to Shasta County's 11.5%, in Census Tracts 112.09, 121.02, and 123.01, over 23% of families have incomes

[18] U.S. Census Bureau, 2018. Table S1702, Poverty Status in the Past 12 Months of Families, 2013-2017 American Community Survey 5-Year Estimates, all California census tracts. https://factfinder.census.gov/.

below poverty.[19] This is more than double the incidence of poverty than the County as a whole when measured by families. Based on the methodology in the DEIS, these tracts (already shown in Table 3.7-4 to have median incomes of just 66%, 59%, and 71% of the county median income, respectively) are not considered to be low-income populations. However, applying a correct understanding of poverty guidelines and readily available statistics from the ACS, it is clear that there are low-income populations in the study area that must be acknowledged to accurately inform the analysis of socioeconomic and environmental justice effects. This is a necessary revision to ensure the adequacy and accuracy of the DEIS.

Furthermore, on page 3.7-8 the DEIS identifies a "secondary method" for identifying low-income populations if "[o]ther indications are present that indicate a low-income community is present within the Census tract." However, the analysis appears to limit these "other indications" to existing burdens such as limited access to healthcare and dependence on subsistence living. While these indicators are indeed valuable for identifying low-income communities, the analysis neglects to follow up on this secondary method, and it is not discussed further in the DEIS.

T6-65
(Cont.)

In addition to correcting the methods used to assess poverty status using the federal poverty guidelines, a revised analysis should look to the CEQ and USEPA guidance for more useful "secondary" methods than those briefly introduced and ultimately ignored in the DEIS. Section 2.1.2 of the USEPA 1998 guidance directs analysts to "consider state and regional low-income and poverty definitions as

[19] U.S. Census Bureau, 2018. Table DP03, Selected Economic Characteristics, 2013-2017 American Community Survey 5-Year Estimates, study area census tracts. https://factfinder.census.gov/.

appropriate." The State of California has a widely used definition of low-income communities that can easily be adapted for NEPA analyses using readily available data from the ACS: "census tracts with median household incomes at or below 80 percent of the statewide median income" (Health and Safety Code Section 39713(d)(2)). As shown in DEIS Table 3.7-4, the statewide median income in the 2011-2015 ACS was $61,818. Using the state definition of low-income communities, census tracts with median incomes at or below $49,454 would be considered low-income; this would include several census tracts in the study area, including the Strawberry Fields Site. Thus, using this method, it is apparent that numerous low-income populations in the study area must be acknowledged to accurately inform the analysis.

Due to its inadequate baseline, the DEIS provides no substantive assessment of disproportionately high and adverse impacts on minority and low-income communities. As explained above, low-income communities *are* present in the study area for socioeconomics environmental justice. Therefore, the DEIS' identification of no impact on low-income communities is unsupported and inaccurate. For example, although the analysis of substitution effects (pages 4.7-3 and 4.7-4) acknowledges that "how much of the casino's revenue comes at the expense of other business establishments in the area depends on … disposable income levels of local residents and their spending habits, as well as other economic and psychological factors affecting the consumption decisions of local residents," there is no analysis of the potential disproportionately high and adverse economic impacts of substitution effects, including a 24% reduction in revenues of local sporting goods retailers under Alternative A, on low-income communities in the area.

T6-65 (Cont.)

Each of the potential effects of the alternatives must be reevaluated in light of the identification of low-income communities in the study area. T6-65 (Cont.)

7. Transportation/Circulation

The State of California is transitioning to the use of Vehicle Miles Traveled (VMT) for determining the potential for significant traffic impacts. How has the DEIS taken into account VMT analysis and/or reviewed mitigation options which would help reduce VMT? T6-66

Linscott Law & Greenspan (LLG), a transportation planning and engineering firm with experience in the assessment of tribal casino traffic impacts, reviewed the DEIS and associated Traffic Impact Analysis (TIA; DEIS Appendix N). Their report, summarizing their review is attached hereto as Exhibit K, and incorporated herein by reference. The review raises serious questions regarding the adequacy of the DEIS traffic analysis such that a new or substantially revised traffic study is warranted. Some of these concerns are summarized further below. T6-67

The DEIS is missing data, including but not limited to, the adjustment applied in order to correct counts taken during the summer rather than the school year, existing condition signal warrant worksheets, documentation for the derived casino rates, documentation for use of 2.2 people per vehicle for average occupancy, conceptual improvements plans for proposed mitigation, a discussion of intersection queuing and freeway off-ramp queuing, and an explanation of how Year 2040 Saturday volumes were developed. Without this information, the DEIS and TIA cannot be fully reviewed for adequacy. T6-68

The evaluation of only Friday PM and Saturday PM traffic for the local roadway and State highway system is a severe misstep. While it may represent peak hours for the casino, it does not represent peak hours of all traffic on local roadways and the State highway system. Standard traffic analysis, as required by local entities with jurisdiction over the surrounding roadways, would include an analysis of AM and PM peak hours on a Tuesday, Wednesday or Thursday (when school is in session), in addition to the peak hours of the project itself if they fall outside of this range. Analysis of the impact on the project's peak hours is not a substitute for a standard analysis. As such, the traffic analysis likely misrepresents the potential for significant impacts when off-site roadways would be at their peak which is a fundamental flaw in the DEIS. Omni Means review for the City of Redding expressed concern that the analysis likely understates the potential traffic impacts due to the deviation from a typical analysis and calls into question whether there are significant traffic impacts not disclosed in the DEIS.

T6-69

The study area for the Project was improperly defined. It appears that there are locations outside of the TIA study area where the Project exceeds 50 trips, in some cases these locations have close to 200 peak hour Projects trips. The following locations need to be included in the TIA based on the Project's traffic contribution:

1. Market Street (SR-273) at Kenyon Drive
2. Market Street (SR-273) at Breslauer Way
3. Market Street (SR-273) at Buenaventura Boulevard
4. I-5 Southbound Ramps at Knighton Road
5. I-5 Northbound Ramps at Knighton Road
6. Churn Creek Road/Pacheco Road at Knighton Road

T6-70

7. Market Street (SR-273) at Briggs Street
8. Market Street (SR-273) at 3rd Street
9. Market Street (SR-273) at Ox Yoke Road
10. Market Street (SR-273) at Spring Gulch Road

LLG is completing an initial assessment of the missing intersections as well as a comparative analysis of conditions evaluated by the TIA. Based on LLG's preliminary analysis, it appears that intersections I-5 Southbound Ramps at Knighton Road and Market Street (SR-273) at Ox Yoke Road would be significantly impacted by the Project. In general LLG's analysis of existing (Year 2019) intersection delay/LOS is higher (worse) in comparison to the TIA's Year 2016 analysis. LLG's Thursday daily roadway segment volumes are generally higher (up to 32% higher) than the TIA's Friday daily roadway segment volumes. Due to the constraints of the comment period, this comparative analysis is ongoing. We request that any comments submitted on the DEIS and TIA following the comment period be included in the administrative record and taken into consideration.

T6-70 (Cont.)

The above stated concerns clearly warrant revision of the TIA. The inadequate scope of the traffic study area, underestimated traffic impacts, and disclosure of new significant traffic impacts meets the standard for issuing a Revised or Supplemental DEIS. The recirculation for public and agency review is critical to ensuring traffic impacts are adequately addressed.

T6-71

8. Land Use and Agriculture

The DEIS states that "[w]hile local land use policies would not apply to lands taken into federal trust, impacts to the community may occur in terms of a federal

T6-72

project's relation to growth and development visions as described in these guidance documents" (pg. 3.9-1). The conclusion that impacts may occur to the surrounding community is an understatement and would not be limited to simply growth and development visions. For example, noise policies are designed to prevent noise impacts to the surrounding community and visual polices are designed to protect scenic resources. T6-72 (Cont.)

Any local land use policy applicable which is currently applicable to the Strawberry Fields and Anderson sites and is related to reducing environmental impacts needs to be disclosed and evaluated. Table 3.9-1 of the DEIS does not include all applicable County General Plan Objectives. Objective AG-5, regarding "[p]rotection of agricultural lands from development pressures and or uses which will adversely impact or hinder existing or future agricultural operations" is not listed in the table or analyzed in the DEIS. T6-73

The DEIS should clarify that the "adjacent parcels" to the east zoned by the County as C-M (commercial-light industrial) are on the other side of Interstate 5 (pg. 3.9-6). T6-74

The current land use/zoning for Agricultural and Floodway protection indicates that the development alternatives on the Strawberry Fields site are not appropriate. The DEIS further discloses that the Strawberry Fields Site "is located outside the incorporated boundaries of the City as well as its primary and secondary growth areas (areas either adjacent to developed areas or areas otherwise determined appropriate for future urbanization or annexation to the City), and is located outside City's SOI" (3.9-6). As such, the site is not appropriate for the intensity of development proposed. T6-75

The current land use/zoning for Residential use indicates that the proposed alternative on the Anderson site is not appropriate. The DEIS discloses but does not evaluate City of Anderson General Plan Policy RP-3 which is to "[p]rotect existing residential areas from intrusion of incompatible land uses and excessive traffic." The Anderson site is an existing residential area and thus should be protected from incompatible land uses and excessive traffic for a residential area. T6-76

The DEIS does not cite the most up-to-date National Agricultural Statistics Service (NASS) Census of Agriculture. The DEIS refers to the 2012 NASS Census of Agriculture report (pg. 3.9-7), however, a 2017 version of the NASS Census of Agriculture report is available. T6-77

Section 4.9 should include a summary table of relevant local land use policies and objectives and how the alternatives are consistent or inconsistent with these policies. The DEIS fails to address the potential impacts that would occur as a result of the inconsistencies with land use objectives and policies of the surrounding area. T6-78

The proposed project is of a much larger scale, and thus should not be considered similar to the referenced hotel, motel, 2 gas stations and fast food chain located to the north (pg. 4.9-1). T6-79

The cumulative discussion of land use mistakenly refers to the City's municipal code which is not applicable to the Strawberry Fields site (pg. 4.15-23). Furthermore, the EIS does not consider the cumulative effects caused by the project's inconsistency with County land use and zoning designations. T6-80

9. Public Services

The DEIS water supply impact discussion utilizes the City of Redding's 2015 water supply demand (pg. 4.10-2). This should be updated and a drought year scenario should be analyzed. T6-81

The DEIS wastewater treatment and disposal impact discussion utilizes 2015 peak demand data for the Sunnyhill Lift Station which should be updated. The DEIS should specify whether the peak demand includes wet weather events. The DEIS also needs to provide the peak wet weather flow to the Clear Creek wastewater treatment plant. T6-82

The DEIS does not substantiate the conclusion that additional law enforcement facilities would not be required. The DEIS should disclose how much funding the Sheriff's Office currently receives and how this funding would be adequate to serve the proposed alternatives, in addition to continued use of the existing Win-River site for administrative and housing uses.

Using numbers from Section 3.10.4, the existing Win-River Casino makes up almost 1% of the calls for service (538 of the 59,939 calls for service) or 1.5 calls per day for the Sheriff's Office. This is a large percentage considering that the Win-River facility is only one business in the service area of the Sheriff's Office. The proposed analysis should factor in that the proposed project is notably larger than the existing Win-River Casino. The DEIS should also address the potential increased need for detective and district attorney support. T6-83

The DEIS does not disclose the existing number and type of calls for fire protection and emergency medical service to the existing Win-River Casino. Existing response times and response time goals are also not discussed. As this baseline T6-84

information is missing, impacts cannot be properly evaluated, such as whether existing response times can be maintained.

The DEIS fails to address the potential need for new fire protection facilities or equipment.

T6-84 (Cont.)

The service agreements identified as mitigation for law enforcement and fire protection and emergency services improperly defer quantitative impacts.

T6-85

The DEIS does not identify the location of the natural gas pipeline extension that would be necessary to serve the project (pg. 4.10-8). How can the off-site environmental impacts of this extension be evaluated if the location is not disclosed? The extension of electrical and natural gas facilities should be described fully and disclosed in Section 2.

T6-86

The location of the proposed equalization basin should be included on the Site Plan (Figure 2-8). Have the environmental impacts of the basin been evaluated in the DEIS? The equalization basin option should be described fully and disclosed in Section 2.

T6-87

10. Noise

Long term noise levels should present the calculated day-night (Ldn) noise descriptor values (Table 3.11-7). A note should also be included to specify if the equivalent noise level values (Leq) for the long term measurements are 24-hour averages.

T6-88

The noise analysis only considers operation of a single piece of construction equipment (pg. 4.11-2). The analysis should consider the fact that multiple pieces of equipment may operate simultaneously. It would be appropriate to revise the analysis to use the Roadway Construction Noise Model from the Federal Highway Administration and/or the General Assessment methodology for construction noise published by the

T6-89

Federal Transit Administration. This comment also applies to construction of off-site access improvements. T6-89 (Cont.)

Under the Construction Vibration Development at the Strawberry Fields Site Sub-header, The analysis identifies a significant impact from construction vibration annoyance impact and identifies BMPs to reduce this impact to less than significant (pg. 4.11-5). This determination needs to be supported by substantial evidence. This comment also applies to construction of off-site access improvements. T6-90

The noise analysis does not address the County's transportation criteria presented earlier in Table 3.11-6. Table 4.11-3 predicts noise level increases greater than the barely perceptible and clearly perceptible levels on Smith Road and Chum Creek Road that, given the existing background, would represent a new significant traffic noise impact. T6-91

The text indicates a potential significant noise impact from amplified music events at the amphitheater (pg. 4.11-9). This analysis does not consider crowd noise or crowd egress. Use of a 3-dimensional model such as CandnaA or SoundPlan should be used to take into account local topography and meteorology to more accurately estimate resultant noise levels. Additionally, use of the Noise Abatement Criteria (NAC) as criterion for non-transportation noise is inappropriate. Concert events could occur during nighttime hours and not during peak traffic hours where the NAC are commonly applied. T6-92

The impacts of noise and vibration from construction activities, outdoor concerts, and other sources on federally-listed fish species must be evaluated given the proximity to their designated Critical Habitat. T6-93

11. Aesthetics

With the exception of the hotel tower, the proposed height of structures are not disclosed. The DEIS must disclose what assumptions were used to assess the visual impacts of the remaining structures. This information is critical to assessing the project's impact on the gateway to the City of Redding. The project as proposed would be out of scale with the surrounding area. T6-94

The DEIS contains no analysis of the aesthetic effects that the project would have on users of the Sacramento River. The area of the Sacramento River that abuts the Strawberry Fields Site is heavily used by fishermen and other boaters. The project would dramatically change the veiwscape of these users. T6-95

C. A REVISED OR SUPPLEMENTAL DEIS IS WARRANTED.

The standards for recirculating or supplementing a DEIS are provided at 40 CFR §1502.9 as follows:

> If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion. . . . Agencies:
>
> (1) Shall prepare supplements to either draft or final environmental impact statements if:
>
> (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or
>
> (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.
>
> (2) May also prepare supplements when the agency determines that the purposes of the Act will be furthered by doing so.

40 CFR §1502.9 T6-96

Overall, there is a lack of baseline information, disclosure of potential impacts, assessment of needs, and consideration of alternatives, which precludes a meaningful

analysis as required by NEPA. The updates required to address the issues identified in this letter will constitute a substantial change to the DEIS and introduce significant new information which must be recirculated for public review. It is clear that a Revised DEIS or Supplemental DEIS is warranted to address these deficiencies.

T6-96 (Cont.)

NEPA requires the Agency to take a "hard look" at the project alternatives' environmental impacts before deciding whether to proceed. For all of reasons delineated above, the DEIS fails to meet that standard.

Respectfully submitted this June 17, 2019, by

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LIST OF EXHIBITS

A. GLOBAL MARKET ADVISORS, EVALUATION OF THE IMPACT OF THE REDDING RANCHERIA FEE-TO-TRUST AND CASINO PROJECT ON THE ROLLING HILLS CASINO (MAY, 2019)

B. Dorothea Theodoratus, Ph.D. and Kathleen McBride, M.A., REPORT ON TRIBAL HISTORICAL CONNECTIONS TO THE "STRAWBERRY FIELDS" SITE NEAR REDDING CALIFORNIA (MAY 29, 2019)

C. U.S. DEPT. OF THE INTERIOR DECISION ON REDDING'S REQUEST FOR "RESTORED LANDS" DETERMINATION ON "STRAWBERRY FIELDS" (DEC. 22, 2010)

D. MEMORANDUM OF UNDERSTANDING BETWEEN THE SECRETARY OF INTERIOR (BY PRINCIPAL DEPUTY ASSISTANT SECRETARY – INDIAN AFFAIRS), NATIONAL INDIAN GAMING COMMISSIONS, AND REDDING RANCHERIA (OCTOBER 3, 2016)

E. APRIL 25, 2019 LETTER FROM PASKENTA BAND OF NOMLAKI INDIANS TO BUREAU OF INDIAN AFFAIRS, "REQUEST FOR 120 DAY EXTENSION OF TIME TO FILE DEIS COMMENTS ON THE REDDING RANCHERIA FEE-TO-TRUST AND CASINO PROJECT"

F. DEPARTMENT OF THE INTERIOR EMAILS RE: "REDDING TIMELINE" AND "IMPACT OF SHUTDOWN ON EIS/EA SCHEDULES" (NOV. 2018 AND FEB. 2019)

G. ANSWERING BRIEF OF FEDERAL APPELLEES (SEPT. 28, 2012), filed in *Redding Rancheria v. Salazar,* No. 12-15817, U.S. Court of Appeals for the Ninth Circuit, DktEntry 23 at 59-60

H. GLOBAL MARKET ADVISORS, 2017 PROPERTY PERFORMANCE ESTIMATE: WIN-RIVER RESORT & CASINO (UPDATED JUNE 2019)

I. LAND DESCRIPTION (WITH SOURCES): 63.89 ACRES HELD IN TRUST BY THE UNITED STATES NEXT TO PRE-EXISTING REDDING RANCHERIA TRUST LANDS

J. GLOBAL MARKET ADVISORS, ECONOMIC RETURN EVALUATION OF THE REDDING RANCHERIA DRAFT ENVIRONMENTAL IMPACT STATEMENT ALTERNATIVES: REVIEW OF METHODOLOGY, REASONABLENESS OF CONCLUSIONS, AND ANALYSIS OF A MODIFIED "ALTERNATIVE F" (MAY, 2019)

K. LINSCOTT LAW & GREENSPAN, PEER REVIEW – TRAFFIC IMPACT STUDY FOR THE REDDING RANCHERIA PROJECT (JUNE 17, 2019)

EXHIBIT A



Global Market Advisors

Evaluation of the Impact of the Redding Rancheria Fee-to-Trust and Casino Project on The Rolling Hills Casino

May 2019

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I. EXECUTIVE SUMMARY

On April 10, 2019, the Bureau of Indian Affairs ("BIA") published a Notice of Availability, advising the public that as lead agency, the BIA intends to file a Draft Environmental Impact Statement with the U.S. Environmental Protection Agency in connection with the Redding Rancheria's application requesting that the United States acquire approximately 232 acres of land in trust in Shasta County, CA ("Strawberry Fields Site") for the construction and operation of a casino resort, immediately south of the City of Redding ("Proposed Project"). The Draft EIS has put forth three different alternative development scopes for the Proposed Project at the Strawberry Fields site.

The Paskenta Band of Nomlaki Indians ("Paskenta Band") owns and operates the Rolling Hills Casino Resort ("Rolling Hills Casino"), located on Interstate 5 ("I-5") near Corning, CA, approximately 46 miles south of the Strawberry Fields Site. To understand the potential impacts that the Proposed Project at the Strawberry Fields site would have on the future gaming revenue and operating performance of the Rolling Hills Casino, the Paskenta Band engaged Global Market Advisors LLC ("GMA") to conduct a Substitution Effects Study to measure how the Proposed Project will impact the Rolling Hills Casino's operating performance.

GMA provides clients with gaming market assessments, market feasibility studies, primary research, due diligence, payroll control, operations analysis, business and marketing plans, and player reward program design. GMA has worked in gaming markets across the U.S. and has a thorough understanding of the Northern/Central California gaming market, in particular. Dating back to 2007, GMA has conducted market studies for the Enterprise Rancheria, Wilton Rancheria, Cahto Tribe of the Laytonville Rancheria, Scotts Valley Band of Pomo Indians, Coyote Valley Band of Pomo Indians, Table Mountain Rancheria, Sherwood Valley Rancheria and the Tachi Yokut Nation. As such, GMA can provide an unbiased, third-party analysis of the regional market and the "cannibalization" impact that the Proposed Project at the Strawberry Fields site will have on the Rolling Hills Casino. Cannibalization refers to the expected reduction in revenue to regional competitors as a result of a market entrant. Cannibalization is also synonymous with the term "substitution effects" which is often used to describe cannibalization impacts in an economic impact study.

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SUMMARY OF FINDINGS

Utilizing gravity model methodology, GMA performed multiple revenue projection scenarios to understand how the Rolling Hills Casino may be impacted due to the Proposed Project at the Strawberry Fields Site. The first scenario examined gaming revenues for a base case scenario ("Base Projections") in which the Proposed Project does not open and only expected and assumed market changes occur during the forecast period. Additionally, in this scenario, GMA assumed that the Rolling Hills Casino undergoes modest gaming and non-gaming renovations and

expansions (as detailed later in this report). The next scenario ("Alternative A Scenario") assumed the Proposed Project would open in the beginning of 2020, making 2022 its first year of stabilized operations. This scenario timeframe was utilized to sync with the projected year according to the report and projections completed by Pro Forma Advisors LLC ("PFA") in the Draft EIS Volume I Appendix A. By isolating this assumed market change in the Alternative A Scenario, GMA was able to evaluate and forecast the impact of the Proposed Project on the Rolling Hills Casino's gaming revenue in the subject year. GMA performed this same analysis for Alternatives B and C.

Overall gaming market growth in the analyzed scenarios are expected to be very limited as the regional population is already served with a number of quality gaming options throughout the region. GMA projects the Alternative A scope will only grow the regional gaming market by approximately 0.8% in the subject year. As such, the Proposed Project's gaming revenue is expected to largely stem from the cannibalization of other gaming facilities in the regional market area. The largest portion of gaming revenue cannibalization is expected to come from the Rolling Hills Casino, due to its proximity and location on I-5. Specifically, the Proposed Project is to be located adjacent to I-5 and offer an enhanced gaming and non-gaming experience compared to what the current Redding Rancheria's gaming facility offers today.

Historically, the Rolling Hills Casino draws customers from the Redding and Red Bluff market areas and is heavily reliant on outer market patronage from highway travelers along I-5. Therefore, a new market entrant in the form a new casino resort along I-5 is expected to severely impact future Rolling Hills Casino gaming revenue generation, especially from the Primary West, Primary East, and South market segments.[1] In addition, the greatest impact is expected to stem from reduced outer market business by nearly 50%. In 2022, the Proposed Project's casino is projected to cannibalize Rolling Hills Casino's total gaming revenue by 23.2% under Alternative A, 23.0% under Alternative B and 20.1% under Alternative C. The following table summarizes the projected substitution effects by market segment for each alternative.

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[1] The market segment boundaries are defined later on pages 37-39 of this report.

Redding Rancheria Strawberry Fields Alternatives: Impact on Rolling Hills Casino Gaming Revenue, 2022			
	Alternative A	Alternative B	Alternative C
Primary West	-31.3%	-30.3%	-18.9%
Primary East	-51.9%	-51.3%	-43.5%
North	-25.9%	-25.1%	-16.4%
South	-15.7%	-15.3%	-10.6%
East	-10.2%	-9.8%	-6.0%
Secondary North	-25.0%	-24.2%	-15.8%
Secondary South	-3.8%	-3.6%	-2.1%
Tertiary South	-2.0%	-1.9%	-1.3%
Tertiary Southeast	-2.0%	-1.9%	-1.3%
Local Market	**-12.3%**	**-12.0%**	**-8.6%**
Outer Market	-48.8%	-48.7%	-46.7%
TOTAL	**-23.2%**	**-23.0%**	**-20.1%**
Source: GMA			

IMPACT ON ROLLING HILLS EBITDA

Additionally, GMA notes that with the 23.2% forecasted decrease in gaming revenue assuming Alternative A, Rolling Hills Casino EBITDA (earnings before interest, taxes, depreciation, and amortization"), or profit before debt service, will be impacted by a greater percentage due the property's fixed costs and increased marketing expenses that will be required to maintain market share. GMA prepared ProForma Income Statements ("ProForma"), projecting revenues and expenses for the overall Rolling Hills Casino Resort in the Base Projections Scenario. With the Base Projections ProForma complete, GMA prepared ProFormas assuming each Strawberry Fields alternative scenario to measure the impact to the Rolling Hills Casino's EBITDA over a five-year time horizon. In 2022, GMA projects a -37.6% impact to EBITDA as a result of the Alternative A development, -37.4% under Alternative B and -34.6% under Alternative C.

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Redding Rancheria Strawberry Fields Alternatives: Impact on Rolling Hills Casino EBITDA: Five-Year Time Horizon					
	2021	2022	2023	2024	2025
% Impact to EBITDA, Alt. A	-29.5%	-37.6%	-39.3%	-38.2%	-37.1%
% Impact to EBITDA, Alt. B	-29.3%	-37.4%	-39.1%	-38.0%	-36.9%
% Impact to EBITDA, Alt. C	-26.1%	-34.6%	-36.3%	-35.2%	-34.0%
Source: GMA					

II. METHODOLOGY AND ASSUMPTIONS

METHODOLOGY

Global Market Advisors utilized the following methodology in completing this report.

REVIEW OF PRIMARY AND SECONDARY MARKET RESEARCH

GMA initiated this engagement with a review of primary and secondary market research. This included an examination of demographic data for the region and pertinent information publicly available in the Redding Rancheria Fee-to-Trust and Casino Project Draft EIS. Additionally, GMA analyzed economic trends within the region including wage, employment trends, and housing values.

SITE VISIT

GMA conducted a site visit to the market area. During the site visit, GMA visited each primary casino competitor in the region, taking note of each facility's gaming and non-gaming amenities, attractiveness, access, and proximity to local population centers. GMA also visited the existing Win-River Resort & Casino in Redding to understand its relative attractiveness and amenities as well as how the Redding Rancheria operates their existing casino-hotel property today. In addition, GMA conducted a thorough evaluation of the Strawberry Fields site and its surrounding areas. This was critical to understand the site's ease of access from the regional highway network, proximity to population centers, and the types of commercial and residential development around the site.

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ANALYSIS

GAMING MARKET ASSESSMENT

To understand the gaming revenue potential for the Proposed Project at the Strawberry Fields site and how it may impact the Rolling Hills Casino, GMA developed a series of gravity models. The gravity model is a business forecasting model based on Newton's Universal Law of Gravitation. Newton's Law of Gravitation simply states that every particle in the universe attracts every other particle with a force that is directly proportional to the product of their masses and inversely proportional to the square of the distance between them. Newton's theory, which was first published in his 1687 work, "Mathematical Principles of Natural Philosophy" started to be adapted for commercial applications early in the 20th century.

Through a number of modifications, Newton's Law of Gravitation can be applied to the gaming industry. While a casino twice the size of another may not have twice the attraction of another, it does have some constant increased factor of attraction. In terms of distance, squaring the distance is not necessarily always the right figure. Typically, the power to which the distance is

taken varies from a factor 1.5 to 2.5. The reason for this is that the actual distance between two objects will have a varying impact on different communities throughout the United States. This is primarily attributed to varying traffic patterns and geographical barriers between different communities, which results in significant changes in drive time. For example, for an individual living in rural Nevada, traveling 100 miles to reach a business may not be perceived as a barrier as it would likely take less than 1 ½ hours to reach. However, for someone living in the middle of Los Angeles, 100 miles could take up to three hours due to traffic congestion.

By researching and estimating gaming revenue levels at each of the gaming properties within the competitive set, researching the number of gaming positions provided within each, visiting each casino property to understand their relative aesthetic attractiveness (including a consideration of non-gaming amenities), and utilizing gaming factors from proprietary and public sources, the model was calibrated to current market conditions.

Once calibrated, GMA grew the model to the subject year, 2022. This served as the Base Projections Scenario. The Base Projections Scenario factored in expected changes in gaming supply and assumed expansions of gaming facilities in the regional trade area in addition to anticipated demographic growth/decline, and without development of the Proposed Project at the Strawberry Fields site. GMA also examined the Rolling Hills Casino's player database activity over a trailing 12-month period to understand its performance and where players and gaming revenue emanated from in the regional trade area as well as outside of the defined trade area. This analysis was utilized to calibrate the model with a greater degree of accuracy.

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GMA then layered in the Proposed Project, assuming the Draft EIS Alternative A development scope to forecast its potential gaming revenue in 2022 (Alternative A Scenario). By only layering in the Proposed Project at the Strawberry Hill site in this scenario, GMA was able to isolate the Proposed Project's impact on the Rolling Hills Casino as well as other competitors in the regional trade area. Utilizing the gravity model results, the Consulting Team was in a position to quantify the impact of the Proposed Project at the Strawberry Fields site on the Rolling Hills Casino by market segment.

PROFORMA INCOME STATEMENT ANALYSIS

Once Rolling Hills Casino gross revenues were quantified for gaming, hotel, and other relevant revenue departments, GMA completed a ProForma Income Statement down to the EBITDA line for a five-year time horizon for the Base Projections Scenario and Alternative A Scenario. GMA relied on historical operational margins achieved by the Rolling Hills Casino today to appropriately estimate expense margins in the future. GMA also relied on its knowledge of how other comparable facilities have performed after similar competitive expansions occurred in their respective trade areas to complete this portion of the analysis. This analysis yielded the percentage impact to Rolling Hills Casino EBITDA that is expected to stem from Alternative A.

MAJOR ASSUMPTIONS

MARKET CHANGES

GMA prepared its stabilized year forecasts for 2022 and assumed the following changes in the regional market:

- Enterprise Rancheria opens an integrated casino resort in Wheatland, branded as the Hard Rock Hotel Casino at Fire Mountain.
- Wilton Rancheria opens a casino resort in Elk Grove.
- The Mechoopda Tribe does not open a casino near Chico during the forecasting period.

ROLLING HILLS IMPROVEMENTS

The following improvements will be made to the Rolling Hills Casino:

- The 59 lodging keys at the Lodge are fully renovated.
- The Inn will receive a modest renovation.
- The gaming floor is expanded with an additional 150 class III electronic gaming devices ("EGDs") and four table games.
- The food & beverage program at Rolling Hills will incorporate the following improvements:
    - Expanded Timbers Steakhouse and Aromas Café.
    - The existing buffet's seating capacity is reduced to 180 seats.
    - New brew pub restaurant and beer garden.
    - New Fatburger quick serve dining outlet.
    - New casino center bar.
- The current meeting space will be renovated and expanded with capacity for 1,000 in a ballroom configuration (10,000 sq. ft.).
- A natural outdoor amphitheater is built near the north end of the casino.

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REDDING RANCHERIA STRAWBERRY FIELDS PROJECT

Redding Rancheria proposes to build and operate a new casino resort adjacent to I-5, south of Redding as defined in the Executive Summary, Redding Rancheria Fee-To-Trust and Casino Project and shut down its existing Win-River Casino. Under this alternative, the Proposed Project at the Strawberry Fields site was assumed to be comprised of the following gaming and non-gaming amenities under three alternatives:

ALTERNATIVE A

- 69,542 sq. ft casino
    - 1,200 class III electronic gaming devices
    - 36 table games

  - Poker room
- Food & beverage facilities totaling 655 seats, comprised of the following outlets:
  - 225-seat buffet
  - 100-seat café
  - 66-seat specialty restaurant
  - 15-seat bakery/deli counter
  - 125-seat food court
  - 124-seat sports bar and grill
- 250 room hotel
  - 225 standard rooms
  - 25 suites
  - Fitness center
  - Spa
  - Winter garden
- 10,080 sq. ft. of conference and meeting space
  - 4,800 sq. ft. divisible ballroom
  - 5,280 sq. ft. of back-of-house facilities
- 52,200 sq. ft. events center
  - 1,800 seats
- 1,500 seat outdoor Amphitheatre
- 130,000 sq. ft. retail store (assuming a regional sporting goods chain)

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ALTERNATIVE B

- Alternative B includes the same scope of gaming and non-gaming amenities as Alternative A does but does not include the 130,000 sq. ft. retail store

ALTERNATIVE C

- 56,412 sq. ft casino
  - 825 class III electronic gaming devices
  - 21 table games
- Food & beverage facilities totaling 630 seats, comprised of the following outlets:
  - 200-seat buffet
  - 100-seat café
  - 66-seat specialty restaurant
  - 15-seat bakery/deli counter
  - 125-seat food court
  - 124-seat sports bar and grill

- 250 room hotel
  - 225 standard rooms
  - 25 suites
  - Fitness center
  - Spa
  - Winter garden
- 10,080 sq. ft. of conference and meeting space
  - 4,800 sq. ft. divisible ballroom
  - 5,280 sq. ft. of back-of-house facilities
- 52,200 sq. ft. events center
  - 1,800 seats
- 1,500 seat outdoor Amphitheatre
- 130,000 sq. ft. retail store (assuming a regional sporting goods chain)

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III. ROLLING HILLS CASINO OVERVIEW

LOCATION AND ACCESS

The Paskenta Band operates the Rolling Hills Casino Resort, which sits on approximately 2,000 acres of land along I-5, approximately 110 miles north of Sacramento, 53 miles south of Redding, and just south of the City of Corning. To access the facility, both northbound and southbound visitors take Exit 628, just north of the Rolling Hills Casino, and drive south along a frontage road that parallels I-5 along the west side of the interstate.

The map on the next page illustrates the property today. As potential patrons pull off at Exit 628, they see a large equestrian center on the westside of the interstate (highlighted in aqua blue), owned by the Tribe. The existing casino is located in the center of the developed property as highlighted in dark blue on the map.

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The casino is flanked on either side by hotels purchased by the Tribe in February 2017. The Lodge at Rolling Hills is located adjacent and attached to the northern side of the casino, while The Inn at Rolling Hills is located near to but not attached to the southern end of the casino. Both hotel locations are shown in red on the map.

The Tribe also owns and operates a 72-space RV Park (highlighted in pink), an 18-hole golf course (highlighted in dark green), and a Travel Center (highlighted in light green). Additionally, a convenience store/fuel station operates on property through a land lease with the Tribe.



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CURRENT FACILITY AMENITIES

CASINO

- 70,000-square foot gaming floor
  - 850 Class III slot machines
  - 8 table games

FOOD & BEVERAGE

- Buffet (264 seats)
- Timbers Steakhouse (64 seats)

- Casino Lounge (44 seats)
- Aroma's Coffee House (10 seats)

LODGING

The Lodge, a 59-key, interior corridor 3-star hotel
The Inn, a 51-key, interior corridor 2-star motel

PARKING

- Valet parking
- Surface parking
- Truck parking

GOLF COURSE

- 18-hole links-style golf course
- Clubhouse

RV PARK

- 74 spaces
- Travel center

EQUESTRIAN CENTER

- Bleachers for 1,000+ attendees
- 300 covered MDBarnmaster stalls
- 138 ft. by 275 ft. main indoor arena
- 100 ft. by 250 ft. indoor arena
- 150 ft. by 300 ft. outdoor arena with roping chutes
- 20 ft. x 24 ft. covered cattle pens and loading chutes (20 available)
- 48 RV spaces – water and power hook-ups
- Restrooms and showers

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PLANNED IMPROVEMENTS

The casino and an adjacent land parcel are undergoing a number of improvements. This includes the relocation of the player rewards center into a consolidated cage/player rewards/customer service center, a new non-smoking slot area, relocation of the security podium and improvements to various food & beverage outlets. Specifically, planned improvements include the following:

CASINO

- 150 additional electronic gaming devices
- Four additional table games

FOOD & BEVERAGE

- Construction of a new brew pub restaurant and beer garden
- An expansion of the Timbers Steakhouse
- An expansion of the Aromas Café
- A reduction in the seating capacity of the buffet to 180 seats
- The addition of a Fatburger quick-serve dining outlet
- A new casino bar located in the center of the main gaming floor

BANQUET AND MEETING SPACE

- Renovation and expansion of the current banquet room to 10,000 square feet to accommodate up to 1,000 patrons in a ballroom configuration
- A natural outdoor amphitheater built near the north end of the casino

LODGING

- Full renovation of the 59-key Lodge
- Remodel of the 51 rooms at the Inn

PLAYER DATABASE ANALYSIS

To appropriately understand the source of the Rolling Hills Casino's gaming revenue generation today, the trailing twelve months ("TTM") of player database activity was examined. Specifically, GMA noted the amount of carded/tracked gaming revenue generation, carded/tracked gaming revenue generation as a percentage of total gaming revenue generation, and the source of the carded/tracked gaming revenue by defined market segments.[2] The market segments corresponded to the gravity model market segments utilized in the Gaming Market Assessment chapter of this report.

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During this period, the Rolling Hills Casino generated approximately 77.6% of its total carded/tracked theoretical gaming revenue from the defined local market. The remainder or 22.4%, was garnered from customers residing outside of the local market area. Given the nature of the casino's location along I-5, a significant portion of carded players and win emanated from outside of the defined local market carve. Additionally, over 13.0% of theoretical win stemmed from the Redding area, which was encompassed by the Primary West and Primary East market segments. Approximately 15.6% was generated from the South market segment, which encompasses Red Bluff. Most notably, over half of the carded/tracked players emanated from

[2] Carded/tracked gaming revenue refers to the gaming revenue generated by people using the casino's player reward program cards. Carded revenue is gaming revenue recorded at electronic gaming devices; tracked gaming revenue is gaming revenue generated by players who present their cards while wagering at table games.

outside of the local market and generated 22.4% of the total carded/tracked theoretical gaming revenue.

Rolling Hills Casino Player Database Breakdown by Market Segment*				
	Players	Trips	Theoretial Win	Actual Win
Primary West	5.7%	5.1%	6.1%	6.1%
Primary East	6.0%	5.7%	7.1%	6.9%
North	0.5%	0.3%	0.4%	0.3%
South	8.2%	15.3%	15.6%	15.6%
East	0.3%	0.2%	0.2%	0.2%
Secondary North	0.8%	0.3%	0.5%	0.4%
Secondary South	18.0%	45.7%	39.7%	37.9%
Tertiary South	2.8%	4.6%	3.9%	4.0%
Tertiary Southeast	5.6%	3.6%	4.1%	4.2%
Local Market Total	**47.9%**	**80.7%**	**77.6%**	**75.8%**
Outer Market	52.1%	19.3%	22.4%	24.2%
TOTAL DATABASE	**100.0%**	**100.0%**	**100.0%**	**100.0%**
Source: Rolling Hills Casino Management				
**Analyzed for the TTM period ending March 2019*				

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IV. REDDING RANCHERIA PROJECT OVERVIEW

The Redding Rancheria seeks to develop a casino resort on a 232-acre site in Shasta County, immediately south of the City of Redding. As alternatives to the Proposed Project at the Strawberry Fields site, the Tribe is also considering a development in the City of Anderson as well as an expansion of its existing Win-River Resort & Casino. According to the Draft Environmental Impact Study, the purpose of the project is "to facilitate tribal self-sufficiency, self-determination, and economic development." This chapter provides an overview of the location and access for each development site, as well as the proposed gaming and non-gaming amenities for the various development scenarios.

Rendering of the Proposed Strawberry Fields Project

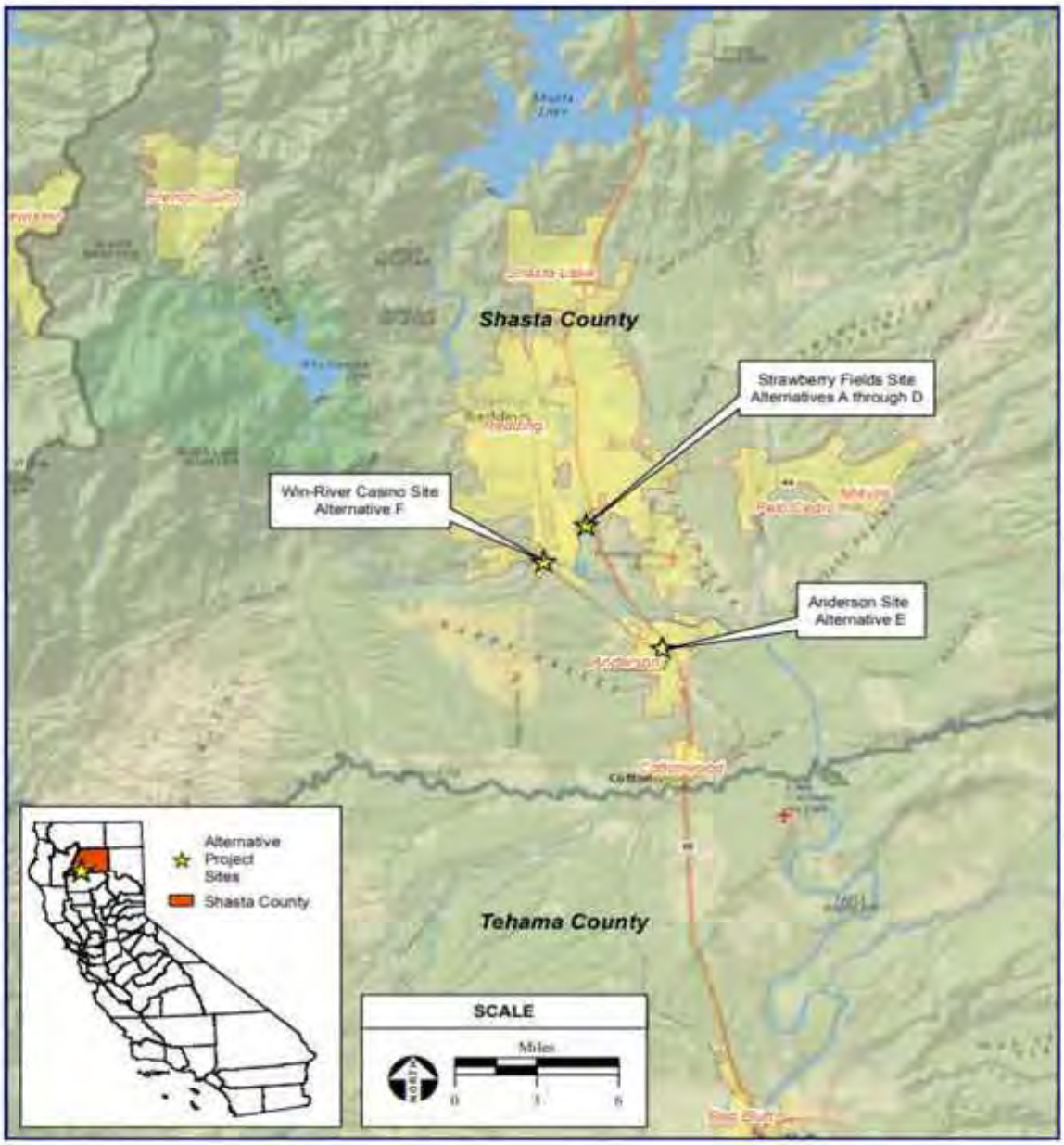


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LOCATION AND ACCESS

The Strawberry Fields site is located on the southwestern corner of the I-5 intersection with Bonnyview Road near Redding, CA. The site is bounded on its east side by I-5 and on its west side by the Sacramento River. It is almost entirely undeveloped, with the exception of cattle fencing and several dirt roads. The Proposed Project at the Strawberry Fields site would be accessible from both the north and south end of the site. From the north, an existing paved road (Bechelli Lane) would be widened to four lanes and extended further south from Bonnyview Road, providing nearly direct access from I-5 at Exit 675. From the south, a new two-lane roadway would be constructed over an existing private access driveway, connecting the site to Smith Road. It is unclear whether or not the south entrance would be accessible from I-5, although there is not currently an exit at I-5 and Smith Road.

The Strawberry Fields site would serve as the location of Alternatives A, B, C, and D, as will be further detailed later in this report. However, Alternative E would be developed on a 55-acre site in Anderson, CA, approximately 6.5 miles south of the Strawberry Fields site. The Anderson site is bounded on its east side by I-5, and the development would be easily accessible from I-5 at Exit 668. The site is bounded by residential neighborhoods on its north, west, and south sides. The location and access for both the Strawberry Fields and Anderson sites are illustrated in the following maps.



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Strawberry Fields Site



Anderson Site



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SURROUNDING DRIVETIME DEMOGRAPHIC SUMMARY

472,932 people reside within a 90-minute drivetime of the Strawberry Fields site. Of that total, 352,680 (74.6%) are 21 or older. Only a small fraction of the total population resides within a 30 to 60-minute drivetime, and these residents are characterized by considerably below average income levels for the region, at an estimated average of $62,978. The average annual household income for the area ("AAHI") is estimated at $69,244, while the average income level for those located within a 30-minute drive was estimated at $70,186. The following table provides a demographic summary of residents located within a 90-minute drive time of the Strawberry Fields development site.

Strawberry Fields Demographics by Drive Time (2019)

Drive Time	Total Population	Adult Pop. (21+)	Avg. Annual Income
0 - 30 min	203,222	151,582	$70,186
30 - 60 min	56,349	41,430	$62,978
60 - 90 min	213,361	159,668	$69,975
TOTAL/AVG.	**472,932**	**352,680**	**$69,244**

Source: PCensus, GMA

The following table provides a demographic summary of residents located within a 90-minute drive of the Anderson development site. Demographics for the Anderson site are similar to that of the Strawberry Fields site, as they are located roughly 6.5 miles away from each other. However, the Anderson site is characterized by a slightly higher population and a slightly lower average annual income when compared to the Strawberry Fields site. The total population within a 90-minute drive time of the Anderson site is estimated at 527,971, of which 392,453 (74.3%) are aged 21 or older. The average annual household income for the area is estimated at $68,924.

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Anderson Demographics by Drive Time (2019)

Drive Time	Total Population	Adult Pop. (21+)	Avg. Annual Income
0 - 30 min	200,761	149,579	$69,981
30 - 60 min	89,240	65,707	$72,031
60 - 90 min	237,970	177,166	$66,879
TOTAL/AVG.	**527,971**	**392,453**	**$68,924**

Source: PCensus, GMA

PROJECT DESCRIPTION

The Redding Rancheria has proposed six alternatives for development of the Project, including four alternatives for the Strawberry Fields site, one for the Anderson site, and one for the existing Win-River Resort & Casino. Alternative A, the Proposed Project at the Strawberry Fields site, would consist of full-scale casino resort development. The 1.1-million square foot development would feature a casino with 1,200 electronic gaming devices ("EGDs") and 36 table games, along with a 9-story hotel tower offering 225 standard rooms and 25 suites. The project would also feature a variety of food & beverage outlets including a 225-seat buffet, a café, a sports bar and grill, a bakery/deli counter, a 125-seat food court, and specialty restaurants. Additionally, the project would include 130,000 sq. ft. of big-box/regional retail space, which would primarily be geared toward outdoor/sporting goods. Other proposed amenities include 10,080 sq. ft. of conference and meeting space, an 1,800-seat event center, a 1,500-seat outdoor amphitheater, an outdoor pool, spa, fitness center, a winter garden, and 2,250 total parking spaces, including both garage and surface parking.

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Alternative B would feature the exact same set of amenities as Alternative A, except for the 130,000 sq. ft. of retail space. Alternative C, the reduced-intensity development, would feature many similar elements of Alternatives A, although gaming amenities would be reduced to 825 EGDs and 21 tables, and other non-gaming amenities would be slightly reduced in size. Alternative D, the non-gaming alternative, would feature significantly reduced non-gaming amenities, and it would not include a casino. The main attraction of Alternative D would be regional retail space that is similar in size and scope to that of Alternative A. The Anderson development, or Alternative E, would be largely similar to Alternative A but with slightly reduced gaming amenities. Alternative F would include an expansion of the existing Win-River Resort & Casino, including the addition of 250 EGDs and a new, 10,000 sq. ft. events center. The existing events center at Win-River would be converted for the additional EGDs in Alternative F.

The table on the following page summarizes the proposed gaming and non-gaming amenities and the development characteristics for each development scenario (Alternatives A – F).

Strawberry Fields Site Development Alternatives						
	Alternative A Proposed Project	**Alternative B Proposed Project - No Retail**	**Alternative C Reduced Intensity**	**Alternative D[1] Non-Gaming**	**Alternative E Anderson**	**Alternative F Expansion of Existing Casino**
Total Sq. Ft	1,123,273	993,273	1,102,042	234,656	1,087,973	756,071
Gaming	1,200 EGDs 36 tables Poker room	1,200 EGDs 36 tables Poker room	825 EGDs 21 tables	N/A	1,200 EGDs 30 tables Poker room	Add 250 EGDs
F&B (# Seats)	Buffet (225) Café (100) Specialty restaurants (66) Bakery/deli counter (15) Food court (125) Sport bar & grill (124)	Buffet (225) Café (100) Specialty restaurants (66) Bakery/deli counter (15) Food court (125) Sport bar & grill (124)	Buffet (200) Café (100) Specialty restaurants (66) Bakery/deli counter (15) Food court (125) Sport bar & grill (124)	Steakhouse (66) Sports bar & grill (99) Café/deli counter (100)	Buffet (225) Café (100) Specialty restaurants (66) Bakery/deli counter (15) Food court (125) Sport bar & grill (124)	No change
Hotel	9-story hotel 225 standard rooms, 25 suites	9-story hotel 225 standard rooms, 25 suites	9-story hotel 225 standard rooms, 25 suites	9-story hotel 128 rooms	250 rooms	No change
MICE	10,080 sq. ft. conference center, 1,800-seat event center	10,080 sq. ft. conference center, 1,800-seat event center	10,080 sq. ft. conference center, 1,800-seat event center	N/A	10,080 sq. ft. conference center, 1,800-seat event center	New 10,000 sq. ft. event center (old event center to be converted for casino use)
Parking	2,250 total spaces 1,650 garage, 600 surface	2,250 total spaces 1,650 garage, 600 surface	2,250 total spaces 1,650 garage, 600 surface	200 surface parking spaces	2,250 total spaces 1,650 garage, 600 surface	Add seven-story, 1,710-space parking garage
Other Amenities	130,000 sq. ft. regional retail, 1,500-seat outdoor amphitheater, one retail shop within the casino, outdoor pool, spa, fitness center, winter garden	1,500-seat outdoor amphitheater, one retail shop within the casino, outdoor pool, spa, fitness center, winter garden	130,000 sq. ft. regional retail, 1,500-seat outdoor amphitheater, one retail shop within the casino, outdoor pool, spa, fitness center, winter garden	120,000 sq. ft. regional retail, one retail shop within the hotel, outdoor pool, spa, fitness center	120,000 sq. ft. regional retail, one retail shop within the casino, outdoor pool, spa, fitness center	No change
Jobs (Construction)	1,372	1,114	1,295	497	1,537	280
Jobs (Permanent)[2]	650	319	558	346	554	42
Development Cost ($mm)	$198.4	$165.9	$180.3	$65.9	$220.9	$43.3
Total Economic Impact ($mm)	$352.8	$272.1	$323.4	$128.7	$375.2	$63.9

Source: Redding Rancheria Draft EIS; GMA. [1] For Alternative D, the existing Win-River Resort & Casino would continue to operate under current conditions. [2] Permanent jobs only show direct new employment attributable to the respective project.

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(Cont.)

V. REGIONAL MARKET OVERVIEW

To gain a better understanding of the local and regional market area, GMA examined the region's demographics, tourism trends, and several relevant economic indicators. GMA compiled and analyzed this information for the immediate local area of Tehama County and the nearby counties of Butte, Colusa, Glenn, Shasta, Siskiyou, Sutter, Trinity, and Yuba.

DEMOGRAPHIC TRENDS

POPULATION

Tehama County is primarily a rural county situated in a valley between national forests with two population centers, Corning and Red Bluff. Larger population centers are located to the north in Shasta County (City of Redding) and to the southeast in Butte County (City of Chico). Tehama County's population in 2018 was estimated at 64,083 and is expected to grow slightly at a compound annual growth rate ("CAGR") of 0.36%. Butte County, with 228,982 total residents, had the highest population among the nine counties, as well as the highest projected annual growth rate at 0.64%. Shasta County is the second most populated county in the defined region with 181,055 residents. Overall, the total regional population is just over 0.75 million people and is expected to grow by over 15,000 residents by 2022, or 0.54% annually. The following table details the projected total population for the four-county region.

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(Cont.)

Total Regional Population

	2018	2022	CAGR
Tehama County	**64,083**	**64,960**	**0.36%**
Butte County	228,982	234,552	0.64%
Colusa County	22,069	22,530	0.55%
Glenn County	28,615	29,085	0.44%
Shasta County	181,055	184,305	0.48%
Siskiyou County	43,830	43,887	0.03%
Sutter County	98,681	101,103	0.65%
Trinity County	13,073	12,954	-0.24%
Yuba County	76,566	78,916	0.81%
Regional Total	**756,953**	**772,292**	**0.54%**

Source: PCensus, GMA

The regional adult population, defined as residents aged 21 years or older, was estimated at 554,164 in 2018. Adults account for 73.2% of the total population, and this figure is expected to reach 73.7% in 2022, indicating an aging trend in the defined region. Trinity County has the highest concentration of adults at over 80%, followed by Shasta County and Siskiyou County with over 75%. The regional adult population is expected to grow annually at a rate of 0.70% through 2022. This trend is detailed in the following table.

Regional Adult Population (21+)			
	2018	2022	CAGR
Tehama County	**46,626**	**47,496**	**0.49%**
Butte County	170,985	177,061	0.94%
Colusa County	15,063	15,480	0.73%
Glenn County	19,964	20,425	0.61%
Shasta County	136,037	138,998	0.58%
Siskiyou County	33,611	33,697	0.07%
Sutter County	69,303	71,626	0.88%
Trinity County	10,487	10,378	-0.28%
Yuba County	52,089	53,705	0.82%
Regional Total	**554,164**	**568,866**	**0.70%**

Source: PCensus, GMA

AVERAGE HOUSEHOLD INCOME

GMA evaluated local and regional AAHI to gain an understanding of household earnings and expected income growth in the area. In 2018, AAHI for the overall region was estimated at $66,846, and it is expected to grow to $71,703 in 2022 at a CAGR of 1.89%. Shasta County is expected to achieve the highest levels of growth in AAHI at a CAGR of 2.35%, followed by Sutter County and Tehama County. Sutter County reported by far the highest levels of AAHI at $77,434 in 2018, and it is projected to reach $83,880 in 2022. The following table details AAHI trends for the defined nine-county region.

T6-97
(Cont.)

Regional Average Annual Household Income			
	2018	2022	CAGR
Tehama County	**$65,523**	**$70,811**	**2.09%**
Butte County	$67,628	$72,316	1.80%
Colusa County	$66,128	$67,219	0.44%
Glenn County	$61,402	$62,260	0.37%
Shasta County	$67,660	$73,825	2.35%
Siskiyou County	$56,860	$60,169	1.52%
Sutter County	$77,434	$83,880	2.16%
Trinity County	$59,830	$62,638	1.23%
Yuba County	$59,402	$62,615	1.41%
Regional Avg.	**$66,846**	**$71,703**	**1.89%**

Source: PCensus, GMA

ECONOMIC TRENDS

EMPLOYMENT TRENDS

GMA examined unemployment rates for each of the nine counties from 2009 through 2018 to understand the economic strength and resiliency of the region since the 2009 recession. In 2018, the average annual unemployment rate in Tehama County was estimated at 5.7%, representing a decrease of nearly ten percentage points since 2010. Tehama County experienced peak unemployment at 15.0% or higher in both 2010 and 2011. Overall, eight out of nine counties posted unemployment rates of 15.0% or higher in 2010 and 2011.

When comparing the nine counties to the State of California average, each county has had significantly higher average unemployment rates. In 2018, unemployment for the state overall was estimated at 4.2%, whereas the lowest rate in the nine-county region was reported by Butte County at 4.9%. The following table illustrates the ten-year annual average unemployment trend for each county, as well as the State of California overall.

10-Year Annual Unemployment

County	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Tehama County	**13.6%**	**15.4%**	**15.0%**	**13.7%**	**11.6%**	**9.6%**	**7.9%**	**7.1%**	**6.4%**	**5.7%**
Butte County	14.3%	16.8%	15.9%	14.2%	11.8%	9.6%	7.8%	7.0%	5.8%	4.9%
Colusa County	14.1%	15.4%	15.5%	14.2%	12.1%	10.7%	8.7%	8.3%	7.5%	6.5%
Glenn County	12.3%	13.9%	13.7%	12.2%	10.3%	8.6%	7.2%	6.6%	5.7%	5.0%
Shasta County	13.6%	15.4%	15.0%	13.7%	11.6%	9.6%	7.9%	7.1%	6.4%	5.7%
Siskiyou County	14.2%	16.8%	17.0%	15.6%	13.1%	11.1%	9.4%	8.5%	7.2%	6.7%
Sutter County	16.5%	18.4%	18.2%	16.8%	14.6%	12.6%	10.7%	9.8%	8.6%	7.5%
Trinity County	16.8%	17.0%	16.7%	14.6%	11.9%	9.4%	7.8%	7.1%	6.0%	5.7%
Yuba County	16.8%	17.8%	17.0%	15.4%	13.2%	11.2%	9.3%	8.6%	7.4%	6.4%
State of California	**11.2%**	**12.2%**	**11.7%**	**10.4%**	**8.9%**	**7.5%**	**6.2%**	**5.5%**	**4.8%**	**4.2%**

Source: U.S. Department of Labor, GMA

Additionally, GMA compiled trailing 24-month unemployment rates, focusing locally on Tehama County to understand recent and potential seasonal employment trends. Over the past 24 months, the highest unemployment has typically occurred in the months of March and July. In March 2019, unemployment in Tehama County was measured at 7.2%, which is the highest reported level of unemployment in the county over the past 24 months. Additionally, the county has reported year-over-year increases in unemployment levels for each month since December 2018. The following table illustrates monthly unemployment rates over the last 24 months, as well as the year-over-year improvement, or percent change in unemployment for each of the trailing 12 months compared to the prior 12 months.

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(Cont.)

Shasta County Monthly Unemployment				
Trailing 12-Month		Prior Year		% Change
Month	Rate	Month	Rate	Y-O-Y
Mar-19	7.2%	Mar-18	6.7%	7.5%
Feb-19	6.9%	Feb-18	6.5%	6.2%
Jan-19	7.1%	Jan-18	6.4%	10.9%
Dec-18	5.6%	Dec-17	5.5%	1.8%
Nov-18	4.8%	Nov-17	5.1%	-5.9%
Oct-18	4.7%	Oct-17	4.8%	-2.1%
Sep-18	4.8%	Sep-17	5.3%	-9.4%
Aug-18	5.6%	Aug-17	6.4%	-12.5%
Jul-18	6.2%	Jul-17	6.8%	-8.8%
Jun-18	5.8%	Jun-17	6.5%	-10.8%
May-18	5.1%	May-17	6.1%	-16.4%
Apr-18	5.8%	Apr-17	6.7%	-13.4%

Source: U.S. Department of Labor, GMA

MAJOR EMPLOYERS & INDUSTRIES

The Rolling Hills Resort & Casino is located along I-5 near Corning, CA, in Tehama County. The economy in Corning is largely based on agriculture. Known as the "Olive Capital," Corning is home to the largest olive processing plant in the U.S. Corning's rural economy also relies on various nuts, fruits, and other crops, as well as livestock ranching. Given Corning's location and proximity to a several national and state parks, tourism-related businesses also generate substantial economic activity. On a broader scale, Tehama County serves as a manufacturing and distribution hub with a strategic location that is favorable from a logistics standpoint.

The following table lists major employers and the number of employees for each respective employer in Tehama County. Walmart facilities employ the most workers in the county including a large distribution center and retail store. Overall, nearly half of employees work in a manufacturing/distribution capacity, followed by government positions at the state, county, and city level. Education, healthcare, and retail also provide significant employment and economic contributions in Tehama County. The top ten employers in Tehama County are listed in the following table.

T6-97
(Cont.)

Major Employers in Tehama County			
Employer	# of Employees	Location	Industry
Wal-Mart Distribution Center	925	Red Bluff	Manufacturing/Distribution
County of Tehama	830	Red Bluff	Government
Rolling Hills Casino	515	Corning	Gaming/Hospitality
Sierra Pacific Windows	510	Red Bluff	Manufacturing/Distribution
St. Elizabeth Hospital	465	Red Bluff	Healthcare
Sierra Pacific Millworks	450	Red Bluff	Manufacturing/Distribution
Sierra Pacific Richfield	358	Corning	Manufacturing/Distribution
Bell-Carter Foods	350	Corning	Manufacturing/Distribution
Red Bluff Elementary School Dist.	260	Red Bluff	Education
T.C. Department of Education	260	Red Bluff	Education

Soure: Red Bluff-Tehama County Chamber of Commerce, GMA

The existing Win-River Resort & Casino, as well as the Strawberry Fields site, are located in Redding, roughly 46 miles north of Rolling Hills. With a population of approximately 90,000 people, Redding is California's largest city north of Sacramento and the county seat for Shasta County. As such, the city's largest employers are in the government, education, and healthcare industries. The largest employer in Redding is the Shasta County government, which accounts for 2,020 employees. The Redding Rancheria is the sixth largest employer in the city, with Win-River accounting for a large share of the Tribe's 565 total employees. The following table lists the ten largest employers in Redding, CA.

T6-97
(Cont.)

Major Employers in Redding, CA		
Employer	# Employees	Industry
Shasta County	2,020	Government
Mercy Medical Center	1,505	Healthcare
Shasta Regional Medical Center	818	Healthcare
City of Redding	777	Government
Shasta Community College	612	Education
Redding Rancheria*	565	Tribal Gov't
CA Transportation Department	514	Government
Shasta Union High School District	398	Education
Shasta Community Health	384	Healthcare
Blue Shield of California	330	Healthcare

Source: City of Redding CAFR, GMA
** Note: Includes both tribal government and casino employees*

HOUSING VALUES

GMA also examined housing values Tehama County and the adjacent counties of Butte, Glenn, and Shasta. Housing values were compiled for the ten-year period through 2018 as well as the first quarter of 2019. As of March 2019, the median home value in Tehama County was approximately $255,000. By comparison, Tehama County has traditionally recorded the lowest median home value among the counties evaluated. However, since of 2017, housing values in Tehama County have been more comparable to the overall region. Since 2011, when the median home value in Tehama County reached its lowest point at roughly $102,000, housing values have grown annually at a rate of 13.6%. The State of California average over that period was 8.7%.

Over the time period examined, the four counties in the region have followed a similar trend in home value growth, with each county reaching their lowest point in 2011 and generally increasing over the next several years. Although Glenn County experienced a decline from 2015 to 2017, the median home value has recovered and stabilized at roughly $216,000. Additionally, home values in each county are significantly lower than the statewide average, with all but Butte County reporting median home values at least 50% lower than the State of California overall. The following graph illustrates the ten year median housing value trend for the counties of Tehama, Shasta, Glenn, Butte, and the average for the State of California.

T6-97
(Cont.)



TOURISM TRENDS

Corning is located in Tehama County, situated between the cities of Redding and Chico, just off I-5. Tehama County is a well-known outdoor recreation destination that offers a variety of activities including camping, hiking, boating, wildlife and scenic viewing, mountain sports, hunting, and fishing. Additionally, Tehama County hosts a year-round calendar of events and festivals.

A large portion of the tourism base is derived from the Sacramento region and San Francisco Bay area, which are approximately a two to three-hour drive from Corning. In the surrounding area there are two national parks, the Lassen Volcanic National Park and the Whiskeytown National Recreation Area. These two parks collectively draw over 1.3 million visitors annually. In 2018, visitation to these parks remained high, albeit considerably lower than prior years. This was likely a result of the Camp Fire in 2018, which limited access to these parks and likely deterred visitation.

Area National Parks Recreational Visitors

	2014	2015	2016	2017	2018
Lassen NP	432,977	468,092	536,068	507,256	499,435
Whiskeytown NRA	851,901	843,845	875,565	832,063	585,768
Area Total	**1,284,878**	**1,311,937**	**1,411,633**	**1,339,319**	**1,085,203**

Source: U.S. National Park Service, GMA

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Aside from being a destination for outdoor recreation, the Central Valley corridor serves as a midway point along I-5, connecting larger population centers of southern California to cities in the Pacific Northwest, such as Seattle and Portland. As such, many hotel guests in the region stay overnight on their way to or from southern California. According to the Red Bluff Chamber of Commerce, a significant number of international tourists from southeast Asia and China are attracted to the area for its natural beauty, vineyards and various berry trails.

I-5 is heavily traveled in both directions. Traffic counts have steadily grown in and around Corning, as illustrated in the following table. In 2017, Annual Average Daily Traffic ("AADT") was recorded at 56,500 for both northbound and southbound directions on I-5 at Liberal Avenue in Corning, near the Rolling Hills site. From 2013 to 2017, total traffic volumes have increased annually at an average rate of 3.9%. Northbound traffic counts have been slightly higher than southbound traffic by between 3% and 6% over that period. Given Corning's geographic location and the relatively low population base in the area, it is likely that a sizable portion of AADT stems from commercial and tourism travel.

The following table illustrates AADT on I-5 near Corning through 2017, the most recent year for which data were available from the California Department of Transportation.

AADT Near Corning, CA*					
	2013	2014	2015	2016	2017
Southbound	23,900	24,100	25,500	26,500	27,500
Northbound	24,600	25,000	26,500	28,000	29,000
Total	**48,500**	**49,100**	**52,000**	**54,500**	**56,500**

Source: California Department of Transportation, Caltrans, GMA
**AADT is shown for I-5 Liberal Ave 5.769*

AADT levels on I-5 in Redding are more than twice as high as they are near Corning. In 2017, AADT was recorded at 119,000 on I-5 at Churn Creek Rd., which corresponds to exit 675 and is directly accessible to the Strawberry Fields site. Given that Redding is more densely populated than Corning, it is likely that its significantly higher AADT levels are attributable to local traffic as well as commercial and tourism travel. The following table shows AADT on I-5 in Redding near the Strawberry Fields site through 2017.

T6-97
(Cont.)

AADT Near Redding, CA*					
	2013	2014	2015	2016	2017
Southbound	50,000	51,000	53,000	56,000	58,000
Northbound	56,000	57,000	57,000	60,000	61,000
Total	**106,000**	**108,000**	**110,000**	**116,000**	**119,000**

Source: California Department of Transportation, Caltrans, GMA
**AADT is shown for I-5 Churn Creek Rd 12.152*

VI. REGIONAL COMPETITION

The greater Central Valley corridor along I-5 is currently served by several Native American casino properties. In addition, there are numerous poker rooms across the region that generate a modest amount of gaming activity. Rolling Hills' competitors include Win-River Resort Casino, Rain Rock Casino, Colusa Casino Resort, Feather Falls Casino & Lodge, Gold Country Casino, Cache Creek Casino Resort, Thunder Valley Casino Resort, and the Red Hawk Casino. Additionally, there are casino projects that are anticipated to enter the market within the forecasted period, including the Hard Rock Hotel Casino at Fire Mountain, the Wilton Rancheria Casino, and the Proposed Project at the Strawberry Fields site.

CASINO COMPETITION

The following table summarizes key attributes of the existing primary casino competitors in the market area. Descriptions follow beginning with the nearest existing competitors, followed by proposed facilities.

Rolling Hills Casino Competitive Summary

Property Name	Slots	Tables Games	Poker Tables	Hotel Rooms	F&B Outlets	Entertainment	Event & Meeting Space
Win-River Resort & Casino	700	12	7	84	3	Y	Y
Gold Country Casino & Hotel	950	15	-	87	4	Y	Y
Feather Falls Casino & Lodge	850	12	14	84	3	Y	Y
Colusa Casino Resort	1,200	9	-	55	5	Y	Y
Cache Creek Casino Resort	2,700	120	10	200	9	Y	Y
Thunder Valley Casino Resort	3,300	102	27	401	15	Y	Y
Red Hawk Casino	2,500	64	4	-	9	Y	N
Rain Rock Casino	349	8	-	-	3	N	N
TOTAL	**12,549**	**342**	**62**	**911**	**51**	**7**	**6**

Source: Casino City, company websites, GMA

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WIN-RIVER RESORT & CASINO

Located in Redding, about 48 miles north and eight miles west of I-5, Win-River Resort & Casino is the closest and most direct competition to Rolling Hills. The gaming floor has over 700 slot machines, a variety of table games (Blackjack, Single Deck Blackjack, Three-Card Poker, Fortune Pai Gow, Mystery Card Roulette, Double-up Blackjack and Spanish 21) and Bingo. Win-River amenities include:

- Casino
  - 700 EGDs
  - 12 table games
  - Poker room

  - Bingo hall (also used as a showroom)
- 84-room hotel
- Food & beverage
  - Elements Restaurant
  - Creek Side Pub & Grill)
  - Overtime Bar
- Spa
- Nearby RV Park/mini-mart
- Nearby nine-hole golf course

GOLD COUNTRY CASINO

Gold Country Casino & Hotel is located in Oroville, about 56 miles southeast of Rolling Hills. Gold Country Casino has over 950 slot machines, a variety of table games (Blackjack, Four Card Poker, Pai Gow Poker, and Ultimate Texas Hold'em), and Bingo. The resort underwent several renovations in recent years including a complete renovation of all 87 hotel rooms and new bedding, upgraded linens, and appliances. Several of the suites feature balconies, access to the Plaza Sunning Deck, large bathrooms with dual vanities, and Jacuzzis.

Additionally, casino renovations included new carpet, lighting and décor, as well as improvements to their food & beverage areas. On the site visit, GMA noted that the air quality was good, and the non-smoking section was unenclosed, instead relying on portable smoke eaters at the ends of each slot bank.

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Meeting space includes a 5,000 square foot banquet room and a 10,000 square foot events center. The banquet room can be divided into two rooms and primarily hosts celebratory events such as weddings, charity events, and cocktail parties. The events center includes theater style seating for up to 1,200 people. Gold Country amenities include:

- Casino
  - 950 EGDs
  - 15 table games
- An 87-room newly renovated hotel
- 5,000 square foot banquet room/show room
- 10,000 square foot events center (sprung structure)
- 300-seat bingo hall
- Food & beverage
  - Safire Steakhouse
  - Acorn Café
  - Buffet

  - Expresso Bar & Snack Bar
  - Spirits Lounge
- Gift Shop
- A 24-lane bowling center
- 77-space full hookup RV park with pool
- Convenience store with ten gas pumps and two diesel pumps

FEATHER FALLS CASINO & LODGE

Feather Falls Casino is also located in Oroville, about 77 miles southeast from Rolling Hills. Feather Falls Casino is an aging facility in comparison to Gold Country Casino & Resort. The original building was built in 1996 and serves as the smoking area, while the newest section where the Feather Falls Casino Brewing Co. is located serves as the non-smoking area and entertainment venue. The dining fare at the brewing company includes a sushi bar, wood-fired pizza, burgers, steak, and seafood.

The exterior of the attached hotel looks somewhat shabby, but the hotel rooms were quite nice for such an aging product. Notably, the staff provided a high degree of customer service throughout the property. Feather Falls' amenities include:

T6-97
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- Casino
  - 850 EGDs
  - 12 table games
  - Poker room
- 84-room hotel
- Banquet room
- Food & beverage
  - Feather Falls Casino Brewing Co.
  - Dreamcatcher Buffet
  - The Deli
  - Two bars
- 43-space full hook-up KOA Certified RV Park

COLUSA CASINO RESORT

Colusa Casino is located in City of Colusa, about 53 miles south of the Rolling Hills Casino and approximately 13 miles east of I-5. They have over 1,200 slot machines, a variety of poker and table games, along with Bingo. Colusa Casino amenities include:

- Casino
  - 1,200 EGDs

  - 9 table games
- 55-room hotel
  - 3 suites
  - 52 standard rooms
- Bingo hall/banquet room/show room
- Food & beverage
  - Table 45 Bar & Grill
  - 37 Seventy Steakhouse
  - Jack's Place
  - Peet's Coffee
  - Snack Bar
- Gift Shop
- Wellness Center
  - Weight room
  - Swimming Pool
  - Sauna

CACHE CREEK CASINO RESORT

Cache Creek Casino Resort is one of the oldest and most successful casino properties in California. It is located outside of the town of Brooks, 42 miles west of Sacramento. The property consists of a casino that houses over 2,700 electronic gaming devices, 120 table games, a high-limit Asian table game room, high limit slot area, a 200-room hotel, a massive parking garage, and a mix of dining amenities that successfully serve diverse groups of gaming customers, particularly Chinese gamers. The facility's hotel is consistently full, and its casino revenue performance is the envy of tribes throughout California. Cache Creek's current amenities include:

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- Casino
  - 2,700 EGDs
  - 120 tables
  - 10 poker tables
- 200-key hotel
  - 27 suites
  - 173 standard rooms
- Outdoor swimming pool
  - Cabanas
- Fitness center
- Spa
- Nine food and beverage venues

    - C2 Steak Seafood – Steakhouse
    - Chang Shou – Chinese and Pacific Rim
    - Asian Kitchen – Noodle room
    - Canyon Cafe – 24-hour, three meal room
    - Harvest Buffet
    - The Sports Page Pub & Grill
    - Three station food court
        - Loco Express – Mexican quick serve
        - The Deli
        - Sweets Etc. – 24-hour pastries and coffee counter
- Club 888 – a 600-seat showroom featuring headline acts and cover bands
- An outdoor amphitheater in the south parking lot was recently dismantled to allow for the construction of the hotel expansion.
- Surface parking to the south and north sides of the property and a five-level, 1,883-space garage with high-speed ramps running in the center of the structure.
    - VIP parking on the first level
- Yocha Dehe Golf Club
    - 18-hole championship course
    - Clubhouse
    - Bahtenta Grill
    - Bar and lounge
- Convenience store and gas station
- Hotel Expansion Under Construction
    - 459-key hotel
    - New 21-and-older outdoor pool
    - Restaurant
    - Conference and meeting space
    - Multi-purpose ballroom

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In 2017, Cache Creek began constructing a 459-room hotel expansion that is expected conclude in mid-2019. In addition to the new hotel rooms, the expansion will include a new pool, a new restaurant, additional meeting space, and a multipurpose ballroom. As part of this expansion, the spa will more than double in size from 5,500 square feet to over 12,000 square feet, featuring 11 treatment rooms, up from the current five.

THUNDER VALLEY CASINO RESORT

The Thunder Valley Casino Resort is owned and operated by the United Auburn Indian Community. The property opened in 2003 and is located 30 miles northeast of downtown

Sacramento. The casino resort recently underwent a massive expansion project that included a complete renovation of the existing 297 hotel rooms, a new hotel lobby, and a lobby bar. Additionally, the Tribe completed construction of the remaining three floors of the 17-story hotel tower, increasing the room count from 297 rooms to 401 rooms.

Improvements to the casino floor include cosmetic improvements to the lighting, renovation of the restrooms, a new 25,000 square foot smoke-free poker room and bingo hall, a newly expanded high limit area to accommodate over 200 high limit slot machines, and a new high limit lounge. The casino receives between 16,000 and 22,000 visits daily and the hotel typically operates at 97 percent occupancy. Thunder Valley's amenities include:

- Casino
  - 3,300 EGDs
  - 102 table games
  - 27 poker tables
  - High limit table game room
  - High limit slot area
- Food & beverage
  - Red Lantern (upscale Asian)
  - High Steaks Steakhouse
  - The Buffet
  - Thunder Café
  - 5-station food court
    - Fatburger
    - Peet's Coffee
    - Panda Express
    - Subway
    - Pizza Hut Express
  - Thunder Bar
  - Mingle
  - Illusions Ultra Lounge
  - The Bar at High Steaks Steakhouse
  - Red Lantern Bar
  - High Limit Bar
  - Lobby Bar
  - Coconut Pool Bar
- 401-key hotel
- Spa
- Fitness Center

T6-97
(Cont.)

- Outdoor pool area
- 9,740 square foot banquet room (seating for up to 800)
- Outdoor Amphitheater
- Valet parking
- Garage parking
- Surface parking

RED HAWK CASINO

The Red Hawk Casino is owned and operated by the Shingle Springs Band of Miwok Indians. The casino is located off US-50, 37 miles east of downtown Sacramento. Lakes Gaming assisted in the design and development of the casino, operating it under a management contract from its opening in 2008 until 2010.

The Red Hawk Casino has struggled financially, despite its proximity to downtown Sacramento and the dense population in the southeast Sacramento valley. This is due in large part to high infrastructure development costs that included the expense of building ramps and access roads from US-50. The property also lacks a hotel and is somewhat removed from residential areas. Nevertheless, the casino property succeeds in attracting its share of the Sacramento population.

T6-97
(Cont.)

Red Hawk Casino's amenities include the following:

- Casino
  - 2,500 EGDs
  - 64 table games
  - 4 poker tables
  - High limit table game room
  - High limit slot area
- Food & Beverage
  - Henry's Steakhouse
  - Koto (three meal)
  - The Burger Spot
  - Pearl Asian Cuisine
  - Waterfall Buffet
  - Hawks Coffee
  - Stage Bar
  - High Limit Bar
  - Mahogany Bar
- Kidsquest
- Cyberquest Arcade

- Gift Shop
- Valet and Garage parking
- Gas Station

RAIN ROCK CASINO

The Rain Rock Casino, which opened in Yreka in April 2018 is owned and operated by the Karuk Tribe. The casino includes 349 gaming machines, eight table games, and three food & beverage outlets. Plans for the casino include a Phase II expansion of 20,000 additional square feet of gaming space, an 80-room hotel, additional parking, 300 additional gaming machines, and eight additional table games. Rain Rock's current amenities include:

- Casino
  - 349 EGDs
  - 8 table games
- Food & beverage
  - Rain Rock Restaurant
  - Rain Rock Express
  - Double R Bar

T6-97
(Cont.)

ASSUMED MARKET CHANGES

Several market changes are expected to occur in the coming years in addition to the Proposed Project at the Strawberry Fields site. GMA assumed that these market changes would occur in preparing the projections detailed in this report.

HARD ROCK HOTEL & CASINO SACRAMENTO AT FIRE MOUNTAIN

The Hard Rock Hotel & Casino Sacramento at Fire Mountain will be located on 40 acres within a 900-acre Yuba County Sports & Entertainment Zone, approximately five miles south of Marysville, CA. The casino site is between CA-70 and CA-65, approximately one mile east of the Toyota Amphitheater. GMA assumed the 140,000 square foot casino will feature 1,600 electronic gaming devices with the ability to add an additional 500 machines and 24 table games after two years. The facility will also feature several restaurants, a 170-room hotel, multiple bars and lounges, a pool, gift shop, and meeting & banquet facilities. The facility is expected to open by the end of 2019.

PROPOSED MECHOOPDA CHICO CASINO

The Mechoopda Tribe has long planned to develop a casino in Butte County. In February 2014, the Bureau of Indian Affairs placed land into trust for the tribe off of CA-149 near CA-99. The project had been stalled for a variety of reasons, the latest being that Butte County continued a

lawsuit challenging the tribe's land-into-trust application. In April 2018 the tribe finally won public support from the community, and Butte County is no longer pursuing an appeal. Former Governor Jerry Brown signed the Compact with the tribe, although it still needs to be approved by the state legislature.

T6-97 (Cont.)

Given the delays that have historically impacted new casino developments in California and to provide an analysis that only measures the effect of the Proposed Project at the Strawberry Fields site on Rolling Hills, the Consulting Team assumed that the Mechoopda Chico Casino does not open during the forecasting period.

VII. GAMING MARKET ASSESSMENT & IMPACT ANALYSIS

To project the potential impact of Alternative A on Rolling Hills Casino's future gaming revenue generation, GMA performed a Gaming Market Assessment, utilizing the gravity model methodology as previously described in Chapter II of this report. Based on the results of the gravity model series, Global Market Advisors was in a position to quantify the Proposed Project's impact on Rolling Hills Casino's gaming revenue during the forecast period.

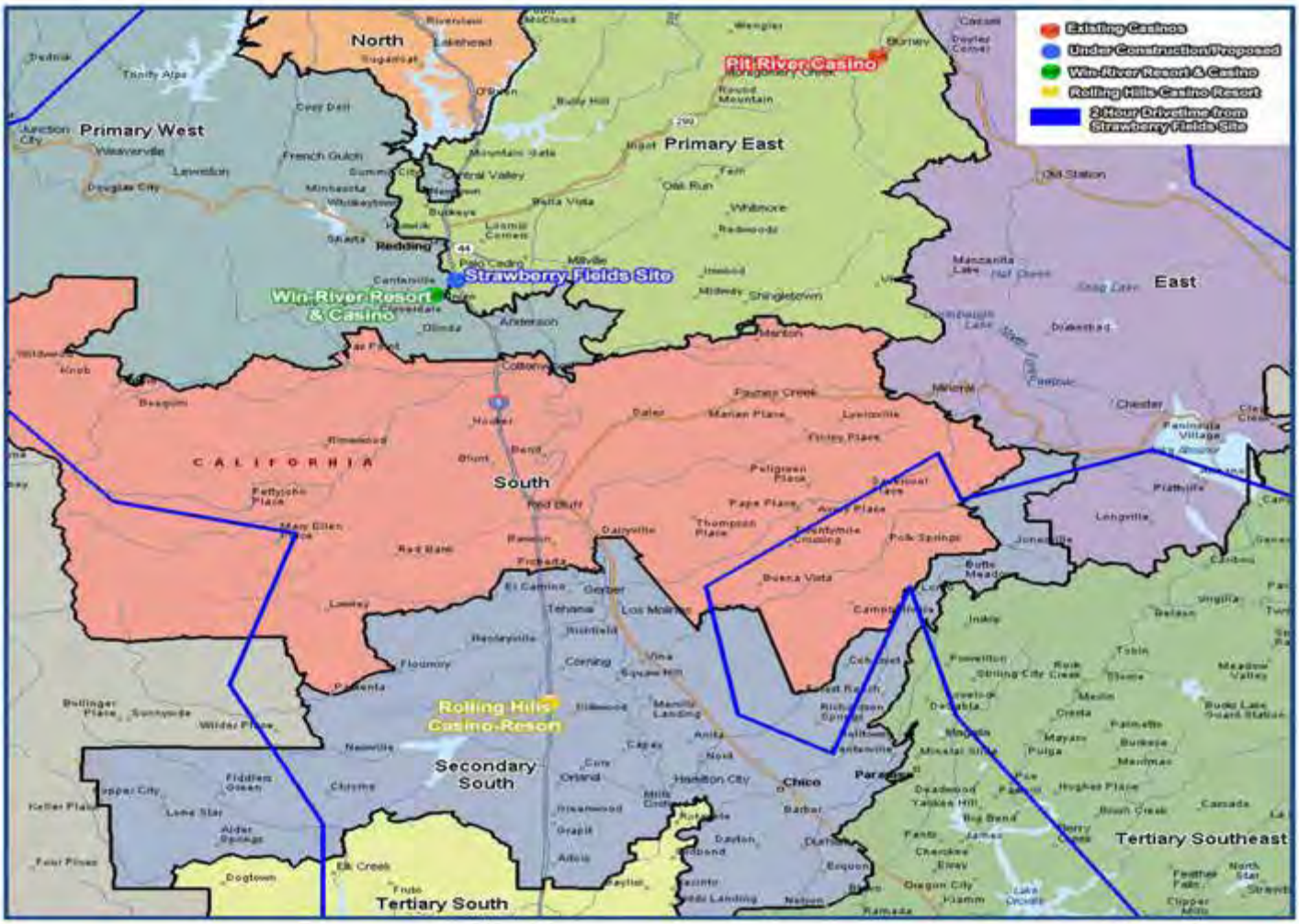
REGIONAL MARKET CARVE

The first step in performing the Gaming Market Assessment was to divide the greater market area into local market segments, utilizing demographic mapping software. The construction of these segments took into account variations in the demographic composition of each region, access to the market's existing and proposed gaming facilities, geographic barriers, roadway infrastructure, relative levels of traffic congestion, and the availability of other non-gaming entertainment activities.

T6-97
(Cont.)

The map on the following page illustrates the nine market segments used in this analysis and the location of each casino in the region. The map is followed by a brief discussion of the demographic composition of each individual market segment. For each market segment, total population, adult population (age 21 and over), and average annual household income ("AAHI") were quantified.

ZOOMED IN MARKET AREA MAP



T6-97
(Cont.)

Comment Letter T6 - Exhibit A

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(Cont.)

ZOOMED OUT MARKET AREA MAP



DEMOGRAPHICS BY MARKET SEGMENT

TOTAL POPULATION

In 2018, the regional market's total population was estimated at 823,492. Low population growth rates are expected in the region, with total population expected to reach 839,204 at a CAGR of 0.51%. The Tertiary Southeast market segment is by far the largest with an estimated 347,741 residents, followed by the combined Primary market segments (Redding) and the Secondary South segment (Corning). The regional market's total population by market segment is listed in the following table.

Total Population

Market Segment	2018	2022	CAGR
Primary West	79,980	81,075	0.36%
Primary East	98,774	100,807	0.54%
North	12,085	12,034	-0.11%
South	47,154	47,854	0.39%
East	9,308	9,185	-0.36%
Secondary North	27,090	27,139	0.05%
Secondary South	160,683	164,699	0.66%
Tertiary South	40,677	41,311	0.41%
Tertiary Southeast	347,741	355,100	0.56%
TOTAL	**823,492**	**839,204**	**0.51%**

Source: PCensus, GMA

T6-97
(Cont.)

ADULT POPULATION

When examining the region by age, there were an estimated 607,741 residents aged 21 or older, representing 73.8% of the total population. The highest concentration of adults is found in the North market segment with 82.0% aged 21 or older, followed by the East market segment with 79.0%. The adult population is expected to reach 623,170 in 2022 at a CAGR of 0.67%. As the total population is projected to grow at a rate of 0.51%, this indicates an aging trend within in the defined region. The following table illustrates the adult population aged 21 and older for each market segment.

Adult Population (Age 21 and Over)			
Market Segment	2018	2022	CAGR
Primary West	60,178	61,165	0.43%
Primary East	74,393	76,221	0.65%
North	9,910	9,916	0.02%
South	35,007	35,757	0.57%
East	7,355	7,262	-0.34%
Secondary North	20,113	20,125	0.02%
Secondary South	116,621	121,038	1.00%
Tertiary South	28,488	29,140	0.61%
Tertiary Southeast	255,677	262,546	0.71%
TOTAL	**607,741**	**623,170**	**0.67%**

Source: PCensus, GMA

AVERAGE ANNUAL HOUSEHOLD INCOME

The average annual household income is relatively similar across each market segment, with the exception of the Secondary North segment. Overall, AAHI in the region in 2018 was estimated at $68,006, and it is expected to reach $72,886 in 2022 at a CAGR of 1.86%. The Primary East and Primary West market segments are expected to achieve the highest levels of annual growth at a projected CAGR of 2.42% and 2.17%, respectively. While the highest levels of AAHI are currently found in the Secondary South and Tertiary South market segments, it is expected that levels of AAHI growth in the Primary East segment will yield the highest overall level of AAHI at a projected $76,315 in 2022. The following table details AAHI by market segment.

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(Cont.)

Average Annual Household Income			
Market Segment	2018	2022	CAGR
Primary West	$ 65,174	$ 70,650	2.17%
Primary East	$ 69,773	$ 76,315	2.42%
North	$ 63,734	$ 67,968	1.73%
South	$ 67,204	$ 72,433	2.02%
East	$ 69,506	$ 73,917	1.65%
Secondary North	$ 55,347	$ 58,666	1.57%
Secondary South	$ 70,504	$ 75,519	1.85%
Tertiary South	$ 70,930	$ 73,092	0.80%
Tertiary Southeast	$ 67,922	$ 72,484	1.75%
AVERAGE	**$ 68,006**	**$ 72,886**	**1.86%**

Source: PCensus, GMA

GAMING FACTORS AND OVERALL MARKET SIZE

Gaming factors consist of Propensity and Average Annual Win, which are discussed below. For the purposes of this assessment, GMA added an additional category to reflect the percentage of gamer visits that will accrue to casinos that were not included in the defined local market. This allowed the model to account for those visits lost to other jurisdictions such as Las Vegas, and it allowed the model's gaming factors to be calibrated to the actual behaviors of regional gaming patrons. The multiplication of these gaming factors by a market's adult population and its AAHI determined the gross levels of gaming revenue generated by the subject market.

PROPENSITY

Propensity represents the percent of the adult population (defined as people age 21 and over) that will visit a casino at least once in a given year. Propensity factors can vary significantly throughout the United States. At the high end of the scale is the local Las Vegas market in which almost 70% of adults will gamble. In rural sections of the country with few gaming options, this factor can be as low as 17%. In the defined regional market area, moderately high gaming factors are expected as this population has had exposure to gaming facilities for quite some time. These propensity factors are estimated to range from 37% to 42%.

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Gaming factors in the United States have remained fairly constant over the past few years and generally only change with the addition of new casinos. However, the onset of the recession had an estimated impact of negative one or two percentage points on these figures. In estimating gaming factors, GMA utilized proprietary research data gathered by GMA as well as other sources.

AVERAGE ANNUAL WIN

Average Annual Win ("Average Win") represents the amount of money a gamer in a market will lose on average to a casino over a twelve month period. This factor is generally dependent on a player's average household income and distance that he/she must travel to reach a casino. Average Win is based on a percentage of a player's AAHI.

Average Win as a percent of gamers' annual income figures experienced in the defined market area is estimated to be moderate compared to other gaming markets around the country. Percent income figures in the market area range from 1.8% to 2.3%, compared to other gaming markets where this figure ranges between 1.1% and 2.6%.

GRAVITY MODEL SCENARIOS AND IMPACT ANALYSIS

MODEL CALIBRATION, TTM 2019

By analyzing and estimating historical gaming revenue levels at each of the casino facilities in the competitive set, researching the number of gaming positions provided within each competitor's casino, visiting each facility to understand their relative aesthetic attractiveness (including a consideration of non-gaming amenities), and utilizing gaming factors from both public and proprietary sources, GMA was able to calibrate the gravity model to current market conditions. To increase the accuracy of the gravity model, GMA utilized historical player database information and gross gaming revenue figures provided by Rolling Hills Casino to calibrate the model to current market conditions for the trailing twelve-month period ending March 2019. The calibration model yielded the amount of gaming revenue generated by market segment for each gaming facility in the model.

BASE PROJECTIONS SCENARIO, 2022

Once the gravity model was calibrated, GMA constructed a Base Projections Scenario. This scenario assumed that the Proposed Project does not open and only expected and assumed market changes occur during the forecast period. Additionally, in this scenario, GMA assumed that the Rolling Hills Casino undergoes modest gaming and non-gaming renovations and expansions (as detailed previously in this report). The Base Projections model also factored in expected growth/decline in demographics as previously summarized in this chapter. As a result, gaming revenue for each market segment and gaming facility was projected in the subject year of 2022.

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ALTERNATIVE A SCENARIO, 2022

In the Alternative A Scenario, GMA layered in the impact of the Proposed Project utilizing the Alternative A development scope as detailed in the Draft EIS. GMA notes that a new casino-hotel resort located along I-5 in the Primary East market segment would stimulate additional, but marginal, market growth in the Primary West/East and North market segments. In total, GMA expects the regional market to grow by approximately 0.8% compared to the Base Projections Scenario. However, since the regional population is already served by several quality gaming options, a new market entrant will generate an overwhelming majority of its gaming revenue by cannibalizing other market area competitors. As such, the Proposed Project's gaming revenue is expected to largely stem from the cannibalization of other gaming facilities in the regional market area. The largest portion of gaming revenue cannibalization is expected to come from the Rolling Hills Casino, due to its near proximity. Specifically, the Proposed Project is to be located adjacent to I-5 and offer an enhanced gaming and non-gaming experience compared to what the current Redding Rancheria's gaming facility offers today.

Historically, the Rolling Hills Casino draws customers from the Redding and Red Bluff local areas and is heavily reliant on outer market patronage from highway travelers along I-5. Therefore, a new market entrant in the form of new casino resort along I-5 is expected to severely impact future Rolling Hills Casino gaming revenue generation, especially from the Primary West, Primary East, and South market segments. In addition, the greatest impact is expected to stem from reduced outer market business by nearly 50%. In 2022, the Proposed Project's casino is projected to cannibalize Rolling Hills Casino's total gaming revenue by 23.2% assuming the Alternative A scope. The following table summarizes the projected substitution effects by market segment for each alternative.

Alternative A Impact on Rolling Hills Casino Gaming Revenue	
Primary West	-31.3%
Primary East	-51.9%
North	-25.9%
South	-15.7%
East	-10.2%
Secondary North	-25.0%
Secondary South	-3.8%
Tertiary South	-2.0%
Tertiary Southeast	-2.0%
Local Market	**-12.3%**
Outer Market	-48.8%
TOTAL	**-23.2%**

Source: GMA

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ALTERNATIVE B AND ALTERNATIVE C SCENARIOS, 2022

GMA also layered in the impact of the Proposed Project under the development scopes of Alternative B and Alternative C. Alternative B is expected to have a nearly identical impact (-23.0%) on Rolling Hills Casino gaming revenue generation in 2022 compared to the Alternative A impact of -23.2%. This is largely due to the identical gaming and non-gaming amenities associated with Alternative A and Alternative B. GMA notes that a large-scale retail component is not likely to drive significant incremental patronage to the gaming floor in Alternative A.

Alternative C is also expected to have a detrimental impact on gaming revenue generation at the Rolling Hills Casino. GMA forecast a -20.1% decline to gaming revenue in 2022 if a new Redding Rancheria casino resort in Alternative C comes to fruition. This impact is comparable to the adverse impact as projected under Alternative A and Alternative B, but is slightly less given a reduced gaming scope in Alternative C.

Redding Rancheria Strawberry Fields Alternatives: Impact on Rolling Hills Casino Gaming Revenue, 2022			
	Alternative A	Alternative B	Alternative C
Primary West	-31.3%	-30.3%	-18.9%
Primary East	-51.9%	-51.3%	-43.5%
North	-25.9%	-25.1%	-16.4%
South	-15.7%	-15.3%	-10.6%
East	-10.2%	-9.8%	-6.0%
Secondary North	-25.0%	-24.2%	-15.8%
Secondary South	-3.8%	-3.6%	-2.1%
Tertiary South	-2.0%	-1.9%	-1.3%
Tertiary Southeast	-2.0%	-1.9%	-1.3%
Local Market	**-12.3%**	**-12.0%**	**-8.6%**
Outer Market	-48.8%	-48.7%	-46.7%
TOTAL	**-23.2%**	**-23.0%**	**-20.1%**
Source: GMA			

IMPACT ON ROLLING HILLS EBITDA

Additionally, GMA notes that with the 23.2% forecasted decrease in gaming revenue assuming Alternative A, Rolling Hills Casino EBITDA (earnings before interest, taxes, depreciation, and amortization"), or profit before debt service, will be impacted by a greater percentage due the property's fixed costs and increased marketing expenses that will be required to maintain market share. GMA prepared ProForma Income Statements ("ProForma"), projecting revenues and expenses for the overall Rolling Hills Casino Resort in the Base Projections Scenario. With the Base Projections ProForma complete, GMA prepared ProFormas assuming each Strawberry Fields alternative scenario to measure the impact to the Rolling Hills Casino's EBITDA over a five-year time horizon. In 2022, GMA projects a -37.6% impact to EBITDA as a result of the Alternative A development, -37.4% under Alternative B and -34.6% under Alternative C.

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Redding Rancheria Strawberry Fields Alternatives: Impact on Rolling Hills Casino EBITDA: Five-Year Time Horizon					
	2021	2022	2023	2024	2025
% Impact to EBITDA, Alt. A	-29.5%	-37.6%	-39.3%	-38.2%	-37.1%
% Impact to EBITDA, Alt. B	-29.3%	-37.4%	-39.1%	-38.0%	-36.9%
% Impact to EBITDA, Alt. C	-26.1%	-34.6%	-36.3%	-35.2%	-34.0%
Source: GMA					

VIII. APPENDICES

FIRM QUALIFICATIONS

GMA provides clients with gaming market assessments, feasibility studies, primary research, economic impact studies, due diligence, payroll control, operations analysis, business and marketing plan development, and player reward program design for the gaming, hospitality, and tourism industries. The principals and associates of GMA have hands-on experience in nearly all aspects of the gaming industry including domestic and international operations, project development, marketing expertise, and detailed market analysis.

GMA is a (Nevada) Limited Liability Corporation with offices in Las Vegas, NV, Denver, CO, and Bangkok, Thailand. Below is the contact information for the company's partners.

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STEVEN M. GALLAWAY

Steve Gallaway is Managing Partner at Global Market Advisors. His areas of expertise include gaming market assessments, hotel and casino feasibility studies, operational reviews and marketing analysis.

Mr. Gallaway has spent his entire career in the gaming and hospitality industry, starting as a valet attendant and eventually rising to chief operating officer and managing partner of a casino in Colorado. Prior to forming GMA, he served as senior vice president of a hospitality consulting firm where he honed his craft in the fields of gaming market assessments and feasibility analysis. During the span of his career, Steve developed hands-on experience in operations management, organizational development, project development, business development, process improvement, contract negotiations, employee development, and customer service training.

In 2005, along with Andrew Klebanow, Mr. Gallaway formed Gaming Market Advisors. In 2014 the firm was rebranded as Global Market Advisors, reflecting the company's evolution as an international gaming, tourism and hospitality consulting firm.

Mr. Gallaway has completed over 300 feasibility studies, with a strong focus on international gaming operations and integrated resort development. Mr. Gallaway has worked on more than 60 projects in Asia, Western and Eastern Europe, the Caribbean, Central America, Canada, and Australia. His knowledge and understanding of emerging markets, particularly those in Asia, has led him to advise institutional investors on new market opportunities in that region, as well as an advisor on established markets. Today, Steve's clients include most public gaming companies, investment banks, private developers and government institutions.

Mr. Gallaway is a visiting lecturer at the University of Nevada Reno's School of Continuing Education where he teaches a class on casino feasibility analysis and marketing measurement. He is a periodic contributor to Global Gaming Business Magazine and Indian Gaming Magazine and has spoken at G2E Las Vegas and the Asian Gaming Congress.

Mr. Gallaway graduated from Boston College with a B.A. in Economics.

ANDREW KLEBANOW

Andrew Klebanow specializes in Marketing Plan and Business Plan Development, Market Research, Casino Property Analysis, Service Quality Measurement Programs and Player Rewards Program Design exclusive to the gaming and hospitality industries.

Mr. Klebanow has worked in the hospitality industry since 1975 and in the fields of marketing and business planning since 1991. He earned a Bachelor of Arts degree at New York University and Master's Degree in Marketing from Cornell University's School of Hotel Administration.

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From 1991-1993, he was Director of Marketing at Sahara Gaming Corporation's Hacienda Hotel and Casino and Director of Marketing and Planning for the parent company's Development Group.

Mr. Klebanow also worked as Director of Marketing for Alliance Gaming Corporation where he conducted the initial market research, consumer testing and marketing plan development for Gamblers Bonus, the industry's first cardless slot club for the company's Nevada slot route division. Gamblers Bonus was the first player tracking system that allowed customers to redeem bonus points for game credits at the machine.

As a consultant to Horseshoe Gaming, Klebanow conducted an analysis of the gaming market in Tunica, MS and subsequently prepared its pre-opening business and marketing plans. In addition, Mr. Klebanow wrote the opening marketing plan for the Horseshoe Casino in Bossier City, LA.

From 1996 to 1999, Klebanow was Vice President of Marketing for Santa Fe Gaming Corporation, where he oversaw the marketing efforts for the Santa Fe Hotel and Casino in Las Vegas and the

Pioneer Hotel and Gambling Hall in Laughlin NV. During his tenure at Santa Fe Gaming, his team repositioned both casinos' player rewards programs to better meet the needs of the business. His most recent position was that of Vice President of Marketing at Sam's Town Hotel and Gambling Hall, where he oversaw the repositioning of the 22-year-old gaming property and the re-branding of its player rewards program.

Mr. Klebanow formed his own consulting firm in 2001 and, together with Mr. Gallaway, formed Gaming Market Advisors in 2005. In 2013, Gaming Market Advisors acquired the consulting firm Galaviz and Co, and rebranded as Global Market Advisors, where Mr. Klebanow is a partner today.

Mr. Klebanow is a periodic lecturer at Cornell University's School of Hotel Administration and the University of Nevada Reno's School of Continuing Education. Mr. Klebanow has authored over 100 articles in Indian Gaming Magazine, Global Gaming Business, In Asian Gaming and in the online gaming publication Urbino.net. He has also contributed academic papers to the Cornell University Hotel and Restaurant Quarterly and the UNLV Hospitality Journal. Mr. Klebanow has written extensively on the subject of player reinvestment and has developed methodologies for calculating a casino's player reinvestment rate. Recently, he focused his attention on casino development in urban environments and published a paper on that subject.

Over the past twenty years Mr. Klebanow has spoken at a number of gaming conferences. He delivered a presentation on Player Reinvestment and Tiered Player Reward Program Design at the Asian Gaming Congress 2010 and on Casino Development in Eastern Russia in 2012. At G2E Asia 2010 he delivered a one-hour presentation entitled "Say My Name: The Application of Loyalty Programs in Asia." He also served as a panelist at G2E Asia 2011 on the Korean gaming market and in 2012 on the Manila gaming market. In 2013 he moderated a panel on marketing communications in Asia.

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Mr. Klebanow also moderated panels and shared the lecture podium at G2E Las Vegas. In 2012 he moderated a panel discussion entitled "Risk and Rewards: Understanding Player Reinvestment." In 2013 he conducted a seminar entitled "An Introduction to Casino Operations" and spoke as a panelist in a session on Trends in Asian Tourism.

In April of 2015 he presented a paper entitled "Casinos and the City" at the Third Annual Asia Pacific Conference on Gambling and Commercial Gaming Research in Beijing and moderated a panel on Trends in Electronic Casino Marketing Communications at the Casino Marketing and Technology Conference in Las Vegas. Most recently, he moderated panel discussions on Gaming in Vietnam, Gaming in Regional Philippine Gaming Markets and Proxy and Digital-Live Gaming at the 2017 and 2018 ASEAN Gaming Summit. He also moderated a panel on Casino Entertainment and Technology at 2018 G2E Asia.

BRENDAN BUSSMANN

Brendan Bussmann, Partner and Director of Government Affairs is a seasoned executive that has an extensive background in government affairs, communications, and business development in the sectors of hospitality, healthcare, energy, higher education, and sports.

In 2015, Bussmann founded his own public affairs and strategic development consultant firm focusing on domestic and international opportunities for clients in hospitality, healthcare, energy, and engineering. He continues to successfully implement strategies, as well as develop and expand new markets for various clients.

Prior to starting his own firm, he served as Vice President of Strategic Development and Marketing for Sunrise Hospital & Medical Center and Sunrise Children's Hospital. During his tenure, he successfully doubled EBITDA in a two-year period while also improving their image and relationship with the community, media, and other stakeholders. Prior to joining Sunrise, Bussmann served as Director of Community Relations with University Medical Center, where he built an external affairs program from scratch.

Bussmann has extensive gaming and hospitality experience from his tenure at Las Vegas Sands Corp. where he served as Director of Government Relations and Community Development. While in this capacity, he was part of the team that secured two gaming licenses in Pennsylvania and Singapore, oversaw ballot initiatives, and numerous legislative victories at the local, state, federal, and international levels. He also implemented the global programs for responsible gaming and community development.

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Additionally, Mr. Bussmann has an extensive background in collegiate athletics, having worked at one of the premiere Power 5 Conference institutions in the United States. Bussmann spent eight years working for the University of Nebraska Athletic Department and football program. During his tenure, he oversaw and was involved in administration, operations, marketing, development, compliance, recruiting, and facility design for the football program and numerous other sports. He is keenly aware of the current college athletic landscape as he continues to stay active in the sector.

Bussmann is a graduate of the University of Nebraska-Lincoln. He is deeply involved in the local Las Vegas community through his involvement with UNLV, the Las Vegas Metro Chamber of Commerce, Clark County School District, the March of Dimes, and Nevada Childseekers.

KIT SZYBALA

Kit L. Szybala is a Partner and the Executive Director of Operations at GMA. Mr. Szybala oversees the output and quality of GMA's feasibility studies, due diligence assignments, strategic planning assessments, and market assessments.

While at GMA, Kit has created over 150 robust financial models in various markets globally. As a part of completing these financial models, he has evaluated over 300 casinos and integrated resorts. Mr. Szybala has written a multitude of extensive, analytical reports, including feasibility studies, impact and cannibalization studies, gaming market assessments, hotel market assessments, non-gaming amenity analyses, and strategic planning assessments.

Kit has in-depth experience in various markets with broad knowledge of markets in the United States, Canada, India, Japan, and Australia. Recently, he completed a white paper entitled "Gaming in India: An Evaluation of the Market's Potential" and assisted in the completion of the white paper entitled "Japan Integrated Resorts."

Mr. Szybala is a visiting lecturer on casino feasibility analysis at the University of Nevada, Reno's School of Continuing Education. He is a periodic contributor to Global Gaming Business Magazine and Asia Gaming Brief and is often referenced for market insights in gaming industry articles. Kit frequently participates on panels and presents at industry conferences, seminars, and events, including ICE Totally Gaming and Sports Betting and Gaming India.

He began his career in hospitality working with Vail Resorts as a member of the Vail Resorts College Program. This program gave him valuable insight into hospitality management and operations by giving him various opportunities to meet with chief members of resort management. It also afforded him the opportunity to work in several different capacities for the corporation, giving him the opportunity to understand the intricacies of resort operations.

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Kit graduated from Southern Methodist University as a Hunt Leadership Scholar with a B.B.A. in Finance, B.A. in International Studies – European Concentration, and minor in History.

ERIKA MEESKE RAFFERTY

Erika Meeske Rafferty is Vice President of Native American Gaming at Global Market Advisors. Erika leads GMA's diverse and evolving service offering to Native American Tribes and First Nations. Her in-depth understanding of the nuances and challenges that face Native American and First Nation communities provides a valuable asset, built on over a decade of gaming and hospitality consulting experience.

Mrs. Rafferty has completed over 250 projects, working with more than 75 different tribes, providing expert analysis at varying development stages. Her body of work and expertise spans an impressive collection of capabilities including:

- Gaming market assessments
- Casino, hotel, and resort feasibility studies
- Amenity analysis

- Highest and best use assessments
- Socio and economic impact studies
- Improvement of business operations
- Primary market research
- Player database and industry surveys
- Psychographic and database analyses

In addition to her efforts in the Native American Division, Mrs. Rafferty is highly skilled in primary market research and facilitates all aspects of the industry and database survey projects from questionnaire development and programming to survey administration and analysis. Through a collaborative process, Erika is able to provide clients the opportunity to gain a deeper understanding of their specific market preferences, habits, and trends to uncover valuable insights. Her continuing contributions to numerous international, national, regional, and property specific studies allows her to maintain a keen eye on emerging global and market-specific industry trends.

Erika's dedication and passion to the hospitality and gaming industry grew from an early age. She has had life-long exposure to the industry, having been raised in the hotel and resort business and has since spent her entire career working in these industries. By performing various operational roles in hospitality related sectors, she gained an enhanced knowledge of the various efficiencies that can be attained at a property and how departments must interact to become a cohesive operation.

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Mrs. Rafferty's experience in resort management has resulted in a well-honed ability to think strategically and solve complex problems. Erika continues to produce tangible business solutions to owners, operators, resort investors, casinos, hotels, conference facilities, entertainment venues, spas, and restaurants.

Erika is a periodic contributor to Global Gaming Business Magazine and Tribal Government Gaming. She continues to be a featured speaker and panelist on relevant industry trends and topics at G2E Las Vegas and NIGA.

Mrs. Rafferty graduated from Southern Methodist University with a B.A. in Economics and a minor in International Studies.

EXHIBIT B

Report On
Tribal Historical Connections
to the
"Strawberry Fields" Site Near Redding California

Prepared by Dorothea Theodoratus, Ph.D. and Kathleen McBride, M.A.

For the Paskenta Band of Nomlaki Indians

May 29, 2019

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Report On Tribal Historical Connections to the "Strawberry Fields" Site Near Redding California

Prepared by Dorothea Theodoratus, Ph.D. and Kathleen McBride, M.A.
For the Paskenta Band of Nomlaki Indians
May 29, 2019

INTRODUCTION/SCOPE OF OPINIONS

We have been asked to provide expert opinions on the following subjects: (1) whether the Redding Rancheria or a particular indigenous tribe has a "significant historical connection" to a 232 acre site adjacent to the Sacramento River, just south of the City of Redding, known as "Strawberry Fields," (2) when did the Redding Rancheria first have an operational tribal government, and (3) when did the Redding Rancheria first have a government-to-government relationship with the United States. We have also been asked to assess the historical significance of Strawberry Fields to the general public and to specific indigenous peoples.

Our qualifications, including lists of our publications, are set forth in our curricula vitae, attached hereto as Addendum 1.

SUMMARY OF OPINIONS

What was first known as "Clear Creek" and later the "Redding Rancheria" is a 30 acre parcel of land that the United States purchased in 1922 to provide housing for "homeless Indians" who travelled to the area as seasonal workers to work on the ranches and fruit farms. As Edgar Miller, Bureau of Indian Affairs Superintendent at the time, wrote to his supervisors about the parcel, the "grounds are admirably located for the camping fruit-picking Indians who come from all over Northern California to earn good wages picking fruit in the Sacramento Valley in the summer time." It was difficult for federal officials to encourage anyone to settle there. In 1923, Miller wrote to the Commissioner of Indian Affairs, that "the Indians are not wanting to settle on this land. They will have to be encouraged." T6-98

The individuals who were subsequently encouraged by United States' agents to take up residency on this parcel were of diverse backgrounds; they were not an identifiable indigenous tribe. Rather, they came from a range of identifiable indigenous tribes: Pit River, Wintun (Wintu and/or Nomlaki), Wailaki, Maidu, Paiute-Shoshone, Yana, Karuk, and Yurok. For example, the first known request to the BIA for anyone to take up residence at the site was in 1933 from a woman whose tribal affiliation is Pit River. Research shows that other early residents were also from Pit River. The Pit River tribe is indigenous to the Pit River area, 40-60 miles to the northeast of this 30 acre parcel.

The Clear Creek Community, the name of the Rancheria's inhabitants before becoming known as the Redding Rancheria, did not function in any organizational manner until September 25, 1939, when the residents held their first meeting and appointed a governing body for the first time. (The original elected officers of the community were a mixture of Wailaki, Wintun, and Maidu peoples.) Because it had no governing body until September 25, 1939, the Rancheria had

no ability to function in any manner as a "government" before that time. Thus, September 25, 1939 would have been the earliest date at which time the Rancheria could have had a government-to-government relationship with the United States.

On August 18, 1958, Congress passed the California Rancheria Termination Act, Public Law 85-671 and thereby terminated a number of California tribes, including Redding. Twenty-six years later, on June 11, 1984, however, the Rancheria gained federal recognition by the terms of the settlement of *Hardwick v. United States,* No. C79-1710 SW (N.D. Cal.).

Thereafter, the Rancheria reacquired portions of the original 30 acres, some of which the United States now holds in trust. Upon entering into a compact with the State of California pursuant to the Indian Gaming Regulatory Act in 1999, Redding commenced "Class III" or casino-style gaming on a portion of these trust lands.

More recently, the Rancheria applied to the United State Department of the Interior to take 232 acres of fee land into trust in order to build a new, larger casino resort. This land, known as "Strawberry Fields," is just south of the City of Redding, bordered to the west by the Sacramento River and to the east by Interstate 5.

In order to be eligible for gaming as "restored lands" for a "restored tribe," Redding "must demonstrate a significant historical connection" to the Strawberry Fields site. Redding cannot make that demonstration. Rather, as explained below, Strawberry Fields is the aboriginal territory of the Wintu people, currently represented by three Wintu bands: the Wintu Tribe of Northern California, the Winnemem Wintu, and the Nor Rel Muk Wintu Nation (collectively the "Wintu Tribe" or the "Wintu"), which are currently seeking federal recognition. The Wintu Tribe, not Redding, has the significant historical connection to Strawberry Fields. While certain members of the Redding Rancheria who are Wintu descendants may claim, as individuals, that they have a significant historical connection to the Strawberry Fields site, the Redding Rancheria, as a tribe, does not.

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(Cont.)

The Redding Rancheria, *qua* tribe, has a significant historical connection to only one site, the original 30 acres purchased by the United States for homeless Indians in 1922. Redding did not come into existence as an identifiable Indian tribal government until September 25, 1939. At that time, its historical relationship to any land was limited to that 30 acres, and that tribe-land relationship lasted only 19 years, until the Termination Act of 1958, beginning anew 26 years later (in 1984) with the settlement of the *Hardwick* case. In short, the Rancheria's "historical" connection to *any* land is a relatively modern one, and it is restricted to the original 30 acre parcel upon which a variety of individuals from diverse indigenous backgrounds took up residence with encouragement from federal officials in the mid-1930s.

The Redding Rancheria is unique in its composition of a variety of indigenous peoples located for the purpose of serving local agriculture. We know of no other Indian tribe in Northern California that was established in such a manner. Unlike other Rancherias in northern California, it was not established for a specific native community in their own indigenous area.

Unequivocal historical and archeological evidence demonstrates that the Strawberry Fields site is the indigenous territory of the Wintu Tribe. The Wintu therefore have a significant and unique historical connection to the Strawberry Fields site. The site and immediately adjacent lands is the location of six Wintu villages bordered by the Sacramento River to the west and Churn Creek to the east. These villages were in existence and occupied well into the 1800's. Between 760 and 950 Wintu resided within about 190 Wintu homes in these villages. These Wintu residents relied upon the salmon runs on the Sacramento River for their subsistence. The Nomlaki people, indigenous to lands south of Strawberry Fields, regularly migrated to the Strawberry Fields site to take part in the salmon harvest and to engage in economic activities with the Wintu residents.

The Strawberry Fields site or lands adjacent to it at the southern end are also associated with one of largest massacres of indigenous people in American history. This massacre, carried out by John Fremont and his forces in 1846, involved the outright slaughter of up to 1,000 Native people, mostly women and children, who were there processing the fish catch. It is highly likely that some of the 760 to 950 Wintu occupants of the six villages described above lost their lives in this historic massacre. Visiting Nomlaki likely fell victim to this massacre. The Strawberry Fields site is, therefore, of great historical interest and warrants careful study and examination, for it is likely eligible for inclusion in the National Register of Historic Places. It is of particular historic interest to the Wintu Tribe, whose ancestors resided there, and to the Paskenta Band of Nomlaki Indians, whose ancestors frequented the site.

In sum, the Redding Rancheria does not have a significant historical connection to the Strawberry Fields site. It has a relatively modern historical connection solely to the 30-acre parcel where "homeless Indians," who eventually organized as a government in 1939, took up residences. The Strawberry Fields site is the indigenous territory of the Wintu, which occupied it for thousands of years, used it for subsistence practices, resided on it, and maintained burial grounds on it or on lands immediately adjacent to it. Finally, the Strawberry Fields site is of great historic interest and sensitivity. It is likely associated with one of the largest massacres of indigenous peoples in American history, and it is of great historic significance to the Wintu Tribe.

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BACKGROUND

The United States Department of the Interior is considering the transfer of 232 acres of land from fee title to federal trust title for the Redding Rancheria ("Redding") for the purpose of constructing a new casino resort. The site is shown in the location map (Map 1) and is known as the "Strawberry Fields." It is located in unincorporated Shasta County about two miles southeast of Redding, California. The land is situated between the Sacramento River on the west and Interstate 5 on the east.

In order for the Interior Department to take the Strawberry Fields site into trust for the Redding Rancheria to engage in casino gaming, the site must qualify as "restored lands" for the Rancheria. Among other things, Redding must have a "significant historical connection" to the site.

We have been asked to issue an expert report to address the three questions set out in the Introduction, above, and, as noted, to assess the historical and cultural sensitivity of Strawberry Fields.

The Indigenous History of the Strawberry Fields Site

The Strawberry Fields site is the indigenous homeland of the Wintu Tribe. More specifically, it is within what ethnographers have identified as the "Bald Hills" (or Daunom) subarea of Wintu Indigenous territory, one of nine Wintu subareas within the larger indigenous Wintu territory that runs along the Sacramento River Valley.

Strawberry Fields, and lands immediately adjacent to it, are the site of six adjacent Wintu villages located along the west side of the Sacramento River, between that River and Churn Creek. The northern most village in this string, *Yonotumnomsono*, is the location of the planned northern access to Redding's proposed casino resort at Strawberry Fields, and changes to this area to accommodate the casino resort will, according to the Interior Department's *Draft Environmental Impact Statement*, impact the cultural and historical resources associated with this historic Wintu village. *Yonotumnomsono* (CAS-SHA-266) is previously determined eligible for listing on the National Register of Historic Places (see Archaeology section). The two Wintu villages in the chain to the south of *Yonotumnomsono*, *Ke nkodi* and *Nosono*, appear to be located on the portion of the Strawberry Fields site designated for construction of the new casino resort. *Ke nkodi* and *Nosono* should be no less eligible for listing on the National Register of Historic Places than *Yonotumnomsono*; for there is highly credible evidence that they share the same ethnographic and archaeological characteristics as that of *Yonotumnomsono*.

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These documented Wintu villages warrant a cultural resources study that assesses their eligibility for inclusion in the National Register under both criterion A and criterion D as a Wintu Cultural Landscape. The estimated length of occupancy, the seasonal, inter-tribal activities carried out in a unique river configuration exceptionally suited to the salmon harvest, and the shared history of assault and attempted annihilation of the entire community contribute to the historical significance of this cluster of villages on the Sacramento River. It is a shared indigenous history of the Wintu and their nearest neighbors to the south, the Nomlaki, and embodies their shared heritage values.

Ethnographic Background

Cora DuBois's *Wintu Ethnography*, published in 1935, remains today the seminal work on the Wintu culture and its subarea divisions. Her work was sponsored by Professor A.L. Kroeber at the University of California, Berkeley, and described the "Wintu on the Sacramento river [in] the series of tribelets" extending for fifty miles north to south, from just above La Moine to five or six miles below Cottonwood Creek (Du Bois 1935:1).

Du Bois (1935:6-8) identified nine Wintu "subareas" (Map 2) as follows:

Upper Sacramento (Nomtipom, west-hillside place)
McCloud (Winimen, middle water)

Stillwater (Daupom, in front of place)
Keswick (Elpom, shore place)
French Gulch (Klabalpom)
Upper Trinity (Nomsus, west dwelling)
Bald Hills (Daunom, in front of west)
Hayfork Wintu
Waimuk (north inhabitant) [re: LaPena 1978a: 5-6, upper valley of McCloud]

A comparison of the location of Bald Hills (Daunom) on Map 2 with the location of Strawberry Fields on Map 1 readily shows that Strawberry Fields is in the Wintu subarea of Daunom. DuBois' work has been followed by Wintu ethnographer, Frank LaPena's research (1978a, b). LaPena's subareas are identical to those of DuBois but with different spellings. For example, he refers to Daunom (Bald Hills) as "Dawnow," meaning "front-west" "the flat valley area at the foot of the hills south of Redding and east of the coastal range" (LaPena 1978b:6). Focusing more narrowly on the Strawberry Fields site, it and the lands directly adjacent to it, are the location of a chain of six Wintu villages as described below.

Jeremiah Curtin, a linguist at the Smithsonian Institution, Bureau of American Ethnology, worked on the anthropology of the eastern part of the Wintu area from 1884 to 1889. Curtin's work on the presence of pre-contact villages in a portion of Wintu territory, from the Sacramento River to the east, has been published by the Redding Museum and Art Center (1980) as *Papers on Wintu Ethnography: 239 Wintu Villages in Shasta County, Circa 1850* (Kardell 1980; Dotta 1980; see Kardell 1980:36, fig. 1). For their research the Kardell/Dotta information (1980) was compared with the original Curtin notes and data omitted from the Kardell/Dotta publication has been added here. Kardell and Dotta compare Curtin's data (1884-1889) to that of the linguist J. P. Harrington's (1931) and find that not only does the linguistic analyses change very little through time, but 72% of the villages were still remembered by descendants in 1931 as places of importance by ancestors (Kardell 1980:3).

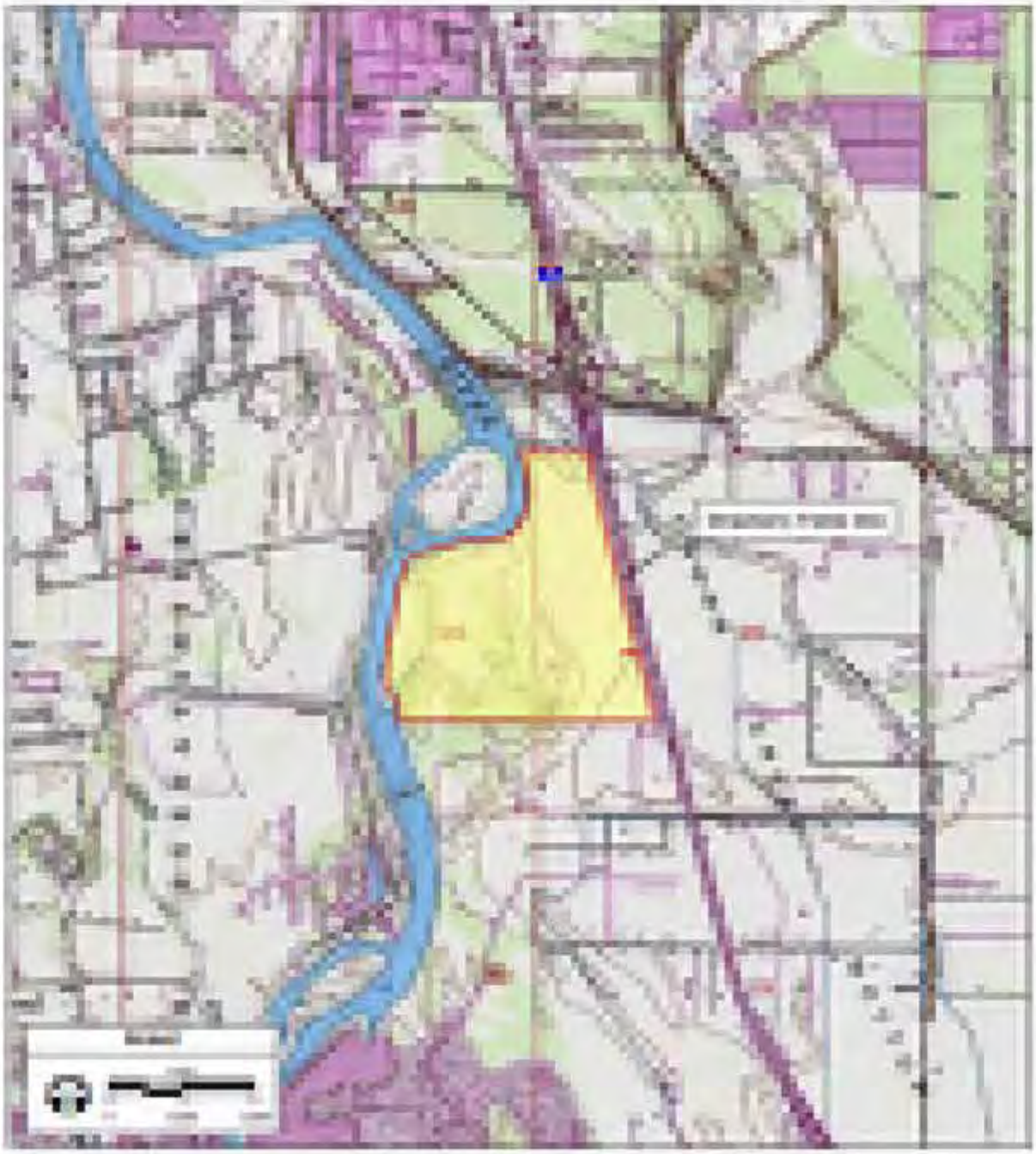
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(Cont.)

In his initial research, Curtin was fortunate enough to find a traditional storyteller, one who knew his people's history and was able to recount it from his own experience and as it had been told to him. He interviewed Norel-putis, a man who "knew everything about his people" and from whom Curtin could reconstruct Wintu geopolitics in the middle of the nineteenth century. Norel-putis, a McCloud River Wintu, had travelled widely among Wintu people as a singer, dancer and storyteller. He died in March 1894 at age 100. Curtin worked with Norel-putis from 1884 to1889 and with two other elders, Klencladdy and Topiwita, in 1889. Norel-putis's nephew, Mike Reed, served as interpreter. The consultant knew the location of villages and headmen as well as the number of houses in each village (Kardell and Dotta 1980:7). His reconstruction of village relationship systems was a substantial contribution to the history of the Wintu and, therefore, the ethnographic reality of the Strawberry Fields site.

In addition, several knowledgeable Wintu and non-Wintu scholars' data (e.g., C. Hart Merriam; knowledgeable indigenous persons) were consulted for the Kardell-Dotta research providing additional data appended to the Curtin notes, especially site locations and word identification. Kardell notes that "a geopolitical framework of interrelations did exist between the 239 villages" listed in their manuscript (Kardell and Dotta 1980:3). She noted that this detailed memory of

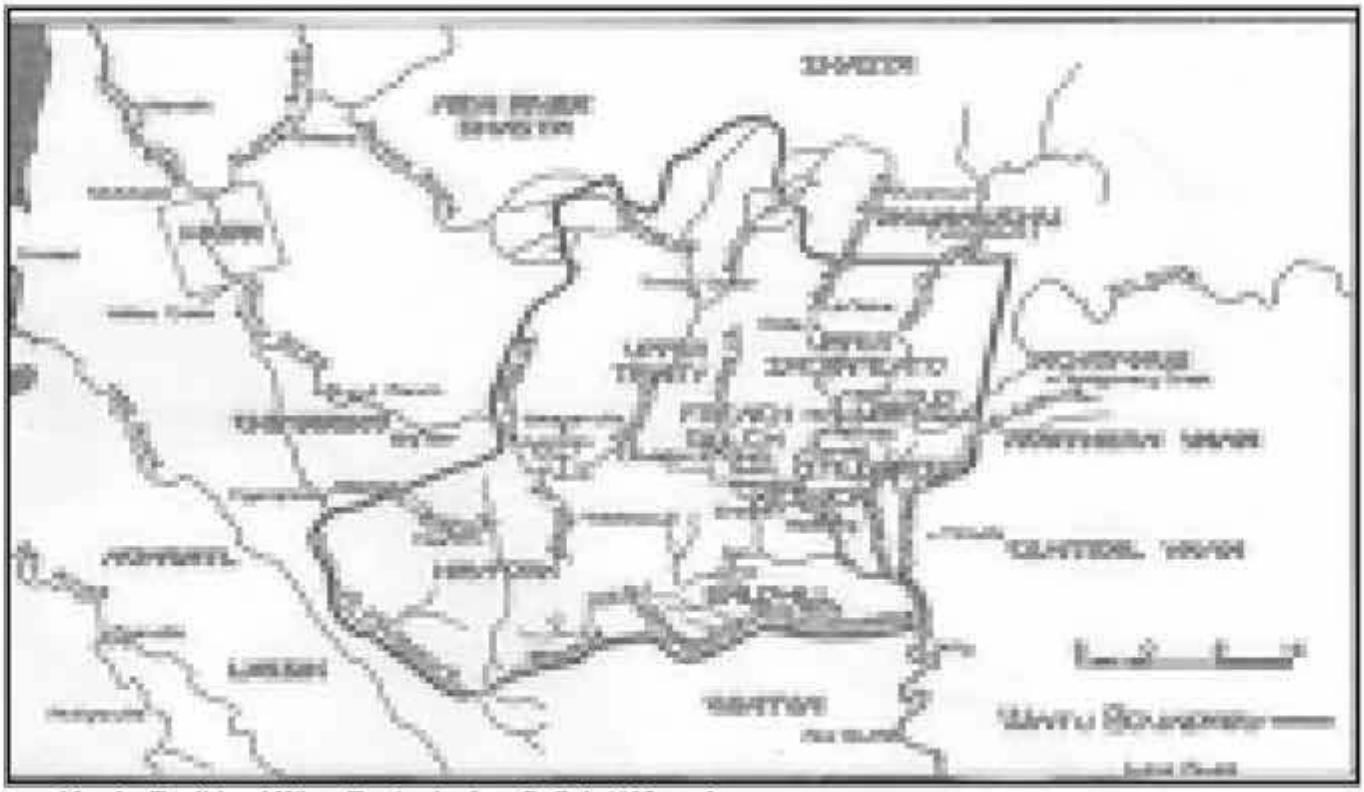
place correlated to the practice of Wintu messaging of events in a sequential pattern, village to village (Kardell 1980:86). Another example of this geographic memory is long distance messaging about fish runs. Wintu people knew all the natural features of the landscape: streams, drainages, mountains, etc., and the way messages were sent would be village to village. Ethnographic research on Wintu features of cultural landscape offers a more complete explanation for Norel-putis' ability to navigate a very expansive territory (see Theodoratus and LaPena 1994:26). This ethnographic insight enhances Norel-putis's credibility in recalling place names, village size, and leadership.

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(Cont.)



Map 1 - Location Map (Strawberry Fields – Project Area)

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(Cont.)



Map 2 – Traditional Wintu Territories from DuBois 1935, pg. 2

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(Cont.)

Curtin's information on villages covers only those areas east of the Sacramento River as shown on Map 3 and focuses on an area that is approximately 2 miles north of that River's confluence with Clear Creek, which enters the river on the west side. Curtin located a string of six Wintu villages to the east of the Sacramento River and to the west of Churn Creek in this area (Map 3).

This is the location of the Strawberry Fields site and immediately adjacent lands. The northern part of the Strawberry Fields site is clearly located between the Sacramento River and a bend in Churn Creek, where that bend comes closest to the Sacramento River. The northern three villages in this string of six Wintu villages are in the same location. Compare Map 3 and Map 1. That the northern part of this string is within or right next to Strawberry Fields is further bolstered by the Interior Department's *Draft Environmental Impact Statement for the Redding Rancheria Fee to Trust and Casino Project* (April, 2019) ("*DEIS*"), where Interior identifies the northernmost village, *Yonotumnomsono*, the subject of prior cultural resource studies under the designation CA-SHA-266, as being the location of the northern entry to Redding's proposed casino at Strawberry Fields.

These six Wintu villages are listed below. The northernmost village, labeled "9" on Map 3 is located southwest of the intersection of Bechelli Lane and South Bonnyview Road and is designated as CA-SHA-266 (See Archaeological Background). This is *Yonotumnomsono*. Villages 4 through 8 form the string running adjacent to the Sacramento River to the south of CA-SHA-266 (village 9, *Yonotumnomsono*). These villages are located along the east side of the Sacramento River in an area where the riverbed narrowed to a rapid flow forcing the salmon

through an upstream riverine funnel ideal for fishing and, therefore, favorable for village locations. Curtin describes these villages south to north as follows:

#4 Nomdaltopi sig. point to the west
"A former Wintu village of 50 houses, opposite the mouth of Clear Creek (Nomwakûtolwenem = up the creek west) Chief Sáka, a bad man who killed Indians by night and day, both Wintu and Nosa. This chief had a son the tallest man on the Sacramento River, his name was Puiwani = going east." (Curtain notes) [Saka = snake re: Emerson Miles; (Kardell and Dotta1980:42)]

#5 Tcakkópûs sig. = young live oak to cut
"A former Wintu village of 10 houses on the East bank of the Sacramento River ½ mile above the mouth of Clear Creek, chief Ni'hluï'lis = shouting to someone" (Curtin notes).
["Roughly opposite the Redding Rancheria" re: Jim Dotta (Kardell and Dotta 1980:42)]

#6 Kentiqĕ'ril (or Kentigeril) [down under village re: Bud Marcardle (Kardell and Dotta 1980:42)
"A former Wintu village of 25 houses on the East bank of Sacramento River. 1 ½ miles above the mouth of Clear Creek, chief, or head-man Teänaldoli = light colored roll of hair." (Curtin notes)
["doli (doolie) = a lightly braided roll of hair with something like a scarf or cloth piece wrapped around the braid like you do with a horse's tail" re: Martha Charles (Kardell and Dotta1980:42)]

#7 Nosono sig. south nose
Kentiqĕ'ril. Chief Kälalwita." (Curtin notes)
"A former Wintu village of 40 houses on the East bank of Sacramento River a short distance above Kentiqĕ'ril. Chief Kälalwita. (Curtain notes)

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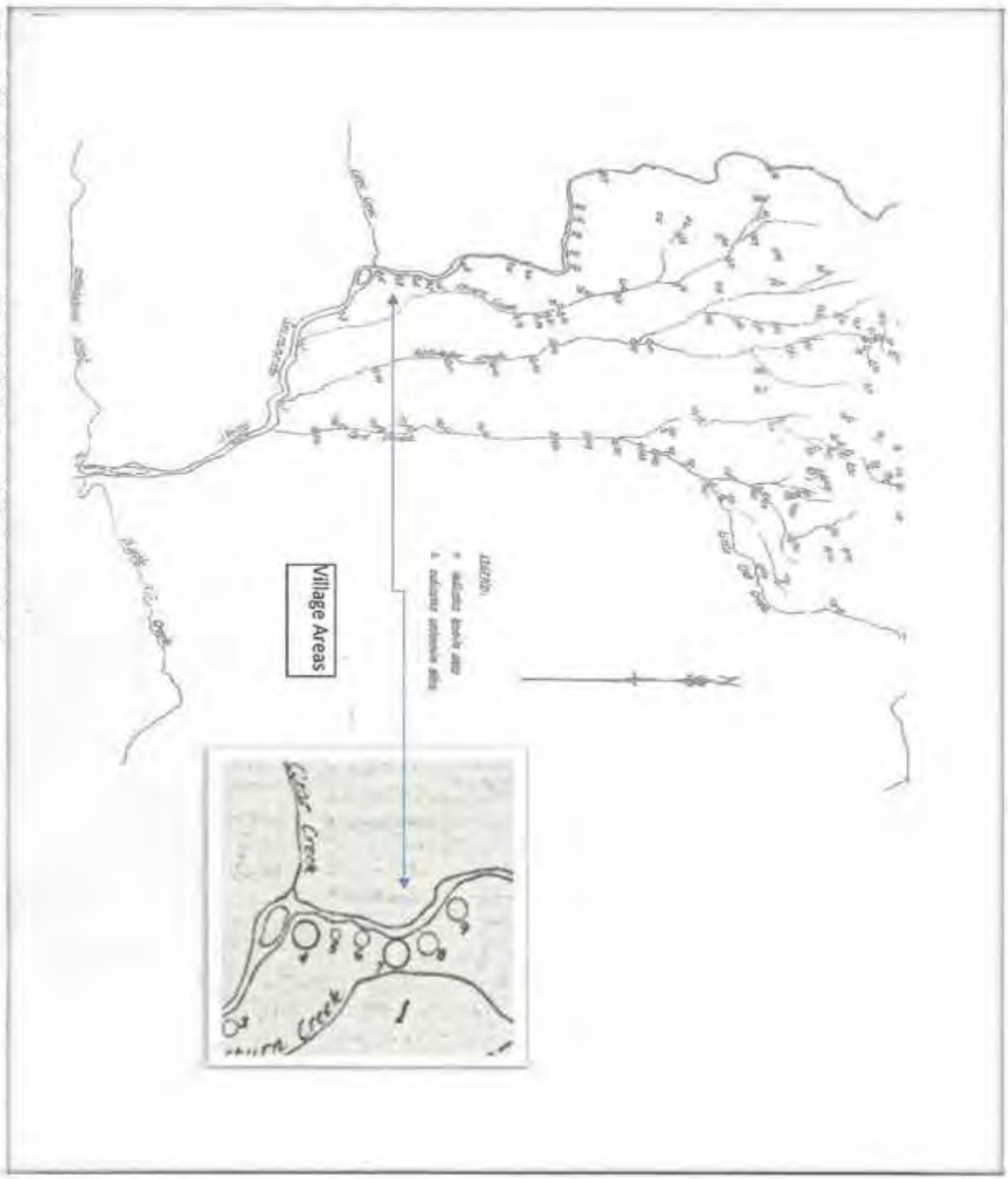
#8 Kĕ'nkodi sig. Foot of the hill [**CA-SHA-268**]
"A former Wintu village of 35 houses on the east bank of Sacramento River ½ mile above Nosono. Chief Päthiwi = drives out." (Curtin notes)

#9 Yonotŭmnomsono sig. buckeye west nose place [**CA-SHA-266**]
"A former Wintu village of 30 houses on the East bank of Sacramento River 3 miles below the free bridge at Redding. Chief Qämamtopi = wing of Komaskulit (an extinct bird) (Curtin notes)
[Bonnyview Bridge site re Jim Dotta (Kardell and Dotta 1980:42)

Dotta identifies a population of 3,015 in the combined Bald Hills, Keswick and French Gulch areas (Dotta 1980; 127, Figure 1). Kardell estimates four or five persons per house. She believes the 1850 Shasta and Trinity counties' Wintu population, based on Curtin data, would have been 28,000 to 34,000. The Wintu villages (4 through 9, Map 3) within and adjacent to Strawberry Fields comprised 190 homes which, using Kardell's calculations of 4 or 5 persons per household, would have had a population of from 760 to 950 Wintu. This is probably a low estimate considering the advantageous location in terms of available foods, particularly from the salmon runs. Indeed, these villages most likely swelled considerably during the two major salmon runs when other Wintu as well as northern Nomlaki to the immediate south would come for the abundance of salmon available twice a year (Field data 2018; Du Bois 1935:7,15).

Dotta notes (1980:119) that short clusters of villages found together suggest "some internal organization that may have reflected some larger social grouping" that one would find for an autonomous village so common among the Wintu. Each village was an independent unit, had a headman or leader, but a subarea might also be under another subleader. Thus, while each village may be an independent political unit under a single person, mechanisms existed that could unite a cluster of villages into a larger cooperative group. This grouping is called a "tribelet" or "village community" meaning a basic autonomous, self-governing, and independent socio political group (Heizer 1978:5). Dotta explains that this cooperative organization could be based on geographic location, trade networks, economic systems and reciprocity. There can be no doubt that Curtin's six adjacent Wintu villages engaged in significant economic and ceremonial interactions.

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(Cont.)



Map 3. Showing Dawnow area (Kardell 1980, Figure 2 Wintu Territory)

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Further, these six villages would have had important economic interactions with other Wintu villages and the Nomlaki, indigenous to adjacent lands to the south. For example the Sacramento River area of the Bald Hills Wintu (see Map 2) was frequented by Wintu people from the west as well as Nomlaki from the south of the Bald Hills for the rich salmon fishing opportunities. Dotta notes that such "river dwelling" combined villages could grant the use of resources, such as allowing fishing in their area. Such a food network could result in an economy based on reciprocal feasting and food distribution which would come from a powerful individual's influence (Dotta 1980:1190222; DuBois 1935:7,15,16,22,28,37). The Nomlaki, now known as the Paskenta Band of Nomlaki Indians, participated in this economy. According to Stephen Powers, the Bald Hills people, particularly those from the Cottonwood Creek drainage, had social get-togethers with guests from other regions (1877:230). Powers noted a particularly close social relationship between the Bald Hills people and the Wintun (Nomlaki) (Powers 1877:238).[1]

Apart from identifying the string of six Wintu villages, composed of roughly 190 homes and 760 to 950 Wintu individuals within and immediately adjacent to the Strawberry Fields site, information from interviews for this study reveals that Strawberry Fields was an area where people from many Wintu groups came to fish, especially during two seasons of salmon runs (Field Data 2018). As noted, Nomlaki to the south of the Wintu also attended to the fisheries here. Information on fish runs would travel easily (Dotta 1980:118-119; Theodoratus Field work on Wintu geography 1970-1995).

Archaeological Background

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The Strawberry Fields site and adjacent areas have been occupied by Wintu people for more than 1,500 years, according to the numerous archaeological investigations undertaken in the area. The prehistoric Wintu, speakers of a Penutian language, are said to have migrated into the Sacramento Valley between A.D. 200 and 500, eventually displacing the resident Hokan speaking people (Johnson and Theodoratus 1984:201; Hildebrandt and Darcangelo 2008:17). Although there are references to various native living areas in the 1800s, the first systematic itemization of living localities was accomplished by Smithsonian scholar, Jeremiah Curtin's description of 1850 villages located on the east bank of the Sacramento River just south of Redding. He noted six village sites along this stretch of the river including the study area locality. Two of these sites have been investigated by archaeologists, Curtin's villages #9 (CA-SHA-266) *Yonotŭmnomsono* and #8 (CA-SHA-268) *Kĕ'nkodi*.

The prehistory of the Redding area has been divided by archaeologists into four cultural patterns as defined by Elaine Sundahl (1990) for the Upper Sacramento Valley. These are identified as

[1] Wintun is labelled by LaPena (Vol 8, p 324) as a language group (linguistic group of Penutian language stock), and encompasses Wintu (within the northern region, what now encompasses Shasta County) and Nomlaki (to the south, what now encompasses Tehema County). Depending on the time of study, Wintun could have meant both Wintu and Nomlaki, but anthropologists now use "Wintun" more to describe the Nomlaki. Here, Powers is relating Wintun with Nomlaki.

the Borax Lake Pattern (8000-5000 BP), the Squaw Creek Pattern (5,0000-3000 BP), the Whiskeytown Pattern (4000-1500 BP), and the Shasta Pattern (Post 1500 BP) (Hildebrandt and Darcangelo 2008:13). The Shasta Pattern, linked to the arrival of the Wintu from the north, saw the establishment of large village sites along the Sacramento River and its larger tributaries. An array of new artifacts was introduced including a variety of fishing tools and food processing materials that indicate an intensive use of acorns and salmon, as well as artistic embellishment on artifacts (Hildebrandt and Darcangelo 2008:18). The Shasta pattern is associated with dwelling structure remains, new cooking implements, and cemetery areas. This is evidence of a change from continuous population movement to permanent villages, further indicated by stored resources, commodity exchange among villages, and a large and expanding population. An archaeological investigation conducted by Clewitt and Sundahl (1981) recovered materials from *Yonotŭmnomsono* (CA-SHA-266; Curtin's village #9), which is identified with the Shasta Complex (post 1500 BP), linked to the arrival of the Wintu in Northern California. Archaeologist Jerald Johnson's research, and his studies of archaeological investigations in the Redding area (1939-1979) has led him to suggest that, ". . . the Shasta Complex, as defined by Sundahl (1982a) represents the prehistory of the Wintu over the last 1200 to 1300 years . . ." (J. Johnson 1983a,b, 1984:np).

The archaeological record compliments both the ethnographic and linguistics research findings of studies conducted in this area. Many earlier studies, termed the "Shasta Complex" (Meighan 1955:32-33), demonstrated ashy middens along the Sacramento River terraces, and often contained house pits, mussel shells, small projectile points, hopper mortars, pestles, spire-lopped Olivella beads, clamshell disk beads and burials. This assemblage has been, in many cases, associated with the ethnographic Wintu (Sundahl 1992; e.g., Smith and Weymouth 1952:29-30; Treganza and Heicksen 1960:42).

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Yonotŭmnomsono (CA-SHA-266; Curtin's village #9) is perhaps the most prominent and documented site in the study vicinity, in terms of archaeological investigation thus far, but the archaeological characteristics of each of the five villages to the south (forming the string of six) within and adjacent to Strawberry Fields are likely very similar and as historically rich. *Yonotŭmnomsono* was recorded by Curtin (1884, 1889) as a named 1850 Wintu village consisting of 30 houses and a leader named Qämamtopi (see above discussion).

The site is on a high flat terrace approximately 80 feet above the east bank of the Sacramento River, immediately north of the Strawberry Fields site. It is known as Eagle Court, named for a commercial development there.

A local physician conducted a limited excavation in the late 1940s with the permission of the property owners, but the information has, for the most part, been lost. What remains of this initial, informal investigation of *Yonotŭmnomsono* was reported by Clewett and Sundahl in a partial mitigation report for proposed construction at the Eagle Court location. Based on the recollections of an "interested spectator" at the site in 1940, the excavation unearthed an estimated 12 to 14 burials with associated artifacts of the pre and post-contact periods. Trade beads were found on the surface of the site. There is no written documentation of this 1940s excavation, and the artifacts uncovered were reportedly sold to an antiques dealer. The disposition of the exposed burials was unreported (Clewitt and Sundahl 1981:9).

Located southwest of the intersection of Bechelli Lane and South Bonnyview Road the site was first recorded in 1962 by James Dotta, although it was locally recognized as an archaeological site years before this. J. Dotta and J. Moore noted in their 1962 Archaeological Site Record that burials from the northern portion of CA-SHA-266 had previously been removed by vandals. The recorded site measured approximately 600 feet east/west by 200 feet north/south. Prompted by both commercial and public development projects, numerous archaeological investigations have been conducted in this immediate area since the 1970s (e.g., Clewitt 1975a, 1975b; Clewitt and Sundahl 1980, 1981; Dreyer 1981; Sundahl 1982; Jensen 1993a, 1993b; Vaughan 1996, 1997, 2000, 2002).

A historic Native American occupation (ethnographic site) is discussed in Clewitt and Sundahl (1981). The frontispiece of their report is a photograph of the Eagle Court site (CA-SHA-266) in the late 1800s provided by Albert Thomas (Wintu). It shows a gabled, wooden slab house structure with seven people gathered outside the dwelling. This documents that native people returned to this site after being expelled from the area in the mid-1800s in the aftermath of Fremont's massacre and genocidal policies against Native peoples carried out throughout California as described below. A property owner (1946-1948) built a house and barn at the site. The report authors were told that Indians came here each fall and camped over the winter for seasonal fishing. Al Thomas, a Wintu elder and site monitor told the archaeologists that Indian people had continued to reside there until 1900. The site, he said, was important as a gathering place for ceremonies and games. A large signal fire, that could be seen as far away as Redding, would serve as an invitation to Indian people to come to this location on the River for a ceremonial or celebratory occasion. Thomas supplied the archaeologists with two photographs taken at the site, which Clewitt and Sundahl confirmed as matching the site location (Clewitt and Sundahl 1981:6-7). Clewitt and Sundahl note,

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> A single artifact, a side-notched arrowhead but from a thin sheet of metal …hints that this late 19th century component was a continuation of the Native American occupation or a reoccupation of the site by Native American Peoples after the disruption to Native cultural patterns by European-American mining and settlement activities [1981:86].

They support the historic occupation by Native Americans with evidence of the photographs supplied by Al Thomas as well as Jeremiah Curtin's listing of the site as a Wintu village in 1850 (Guilford-Kardell and Dotta 1980:42). The archaeological investigation and the historic data support a historic Indian habitation as well as a prehistoric one.

This archaeological investigation of *Yonotŭmnomsono* attending the so-called Eagle Court development occurred between December 26, 1979 and May 6, 1980 by Clewitt and Sundahl under Shasta College Archaeology Laboratory (1981). They found the remains of five identified house floors as well as three burials (Burial #1, #2 and #3). Numerous bone fragments were noted as Burial #2 (Clewitt and Sundahl 1981), as well as one *Olivella* bead. No other artifacts or potential grave goods were visible, and the north half of this unit was abandoned, and all human remains were left in place. Since these burials deliberately were not investigated, interpretation of burial patterns is not clear. However, according to Clewitt and Sundhal, "The

three burials encountered during the excavations (Eagle Court) appeared to be randomly dispersed rather than concentrated in a "cemetery" area, and the positions and orientations of the remains were different in each case" (1981:87).

The data retrieved from the Clewitt and Sundahl excavation at *Yonotŭmnomsono* indicate a lengthy, nearly continuous living area for hundreds of years. The top layers (immediately under Eagle Court) date to historic times, with the top layer relating to early historic times when the site was occupied by non-Indians. Stories were told of Indian people returning to the site for winter camping and fishing. Below those layers was a continuation of Native culture after the disruption of non-Indian activities, which included gold mining, and a genocidal reign of terror. Shasta Complex artifacts were prevalent throughout the lower layers with some stylistic changes. Burial patterns were deliberately not investigated (Clewitt and Sundahl 1981).

Site CA-SHA-266 was re-examined by archaeologist Trudy Vaughan of Coyote & Fox Enterprises in 2000 when a portion of the parcel was proposed for the development of a hotel by the Redding Rancheria. Vaughan also recorded a midden site at the base of the bluff on the primary river terrace, but archaeological work was not proposed. She reported that the previous archaeological evaluation of site CA-SHA-266 had determined it eligible for inclusion on the National Register of Historic Places, a determination with which the State Historic Preservation Office had concurred (2000:1).

During a later Eagle Court construction in July 2002, with attendant monitors, two burials (Burial #1 and #2) were encountered within the site boundary of CA-SHA-266 (Vaughan 2002). Five projectile points and one drill were also recovered. Burial #2 was noted as three individuals. A mortar was noted but left in place. One *Olivella* shell bead and four projectile points were also discovered. These human remains (Burial #1 and Burial #2) as well as any artifacts encountered during construction were reburied in 2002 by representatives from the Redding Rancheria and from the Wintu Tribe.

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Several weeks later human bone fragments were discovered some 50 feet east of the above noted Burial #1. Human remains were noted in the wall adjacent to a previously installed pipe. Rather than disturb the burial, it was decided by the Rancheria to move the water line. The human bone fragments that were collected were bagged and given to a Wintu monitor for safe keeping. That same evening the bone fragments were reburied by the Redding Rancheria and the Wintu monitor (Vaughan 2002).

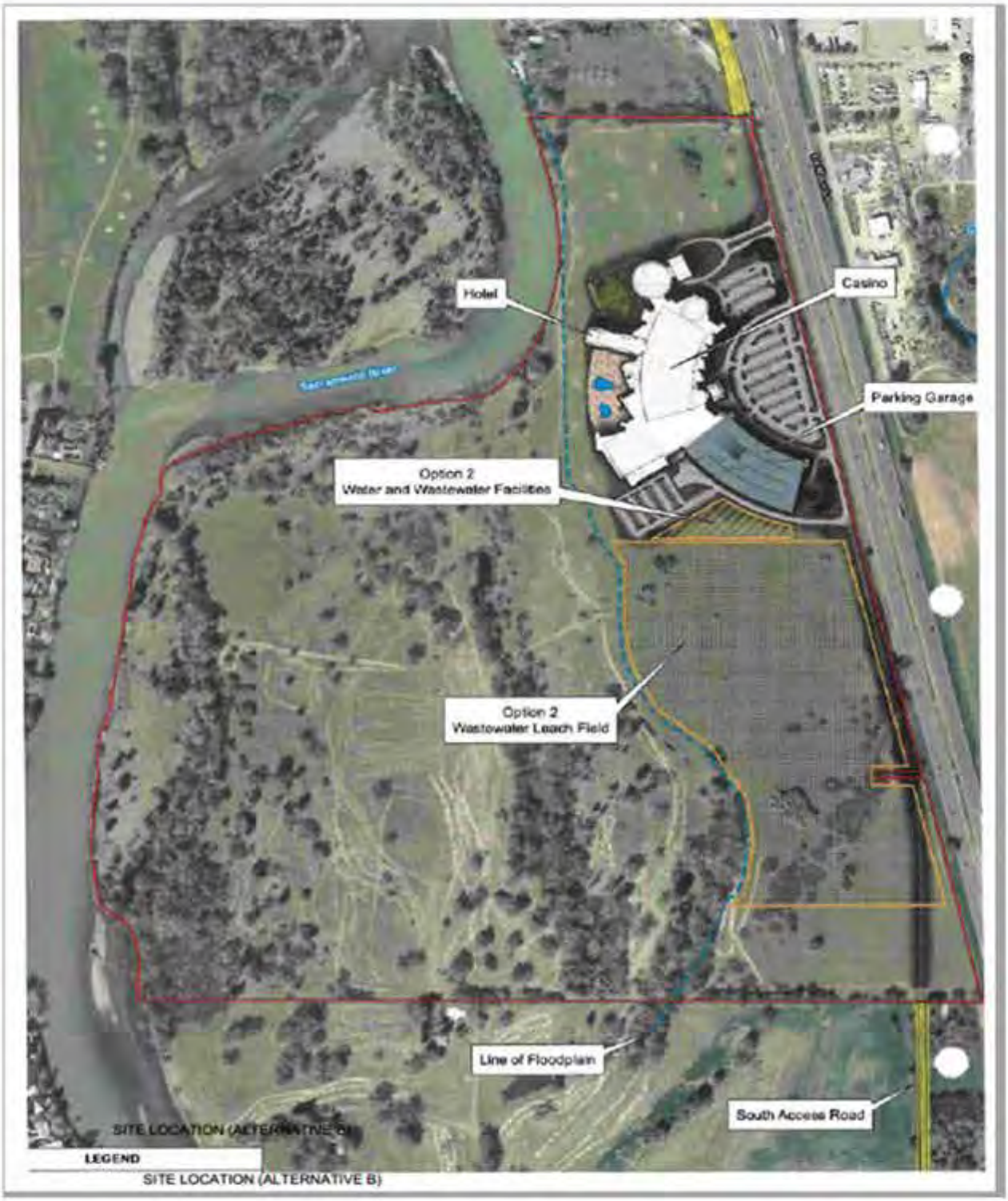
Kĕ'nkodi has been given CA-SHA-268 as an archaeological study designation. This is Curtin's village # 8 (see Map 3). Located immediately south of *Yonotŭmnomsono* (CA-SHA-266) Jeremiah Curtin concludes that this Wintu village consisted of "35 houses on the east bank of Sacramento River." Thus, it was a more densely populated village than *Yonotŭmnomsono* (30 homes), and proper studies of it will likely reveal historical information and archaeological material as, or more, robust than that found at CA-SHA-266. This site was recorded by archaeologists J. Dotta and J. Moore on February 15, 1964. At that time it was situated 20 ft. above the Sacramento River bank. The site record noted that only a small portion of the north end of the site was not disturbed (Dotta and Moore 1964:1).

Just to the south of the Wintu village of *Kĕ'nkodi* (CA-SHA-268 and Curtin village #8) is *Nosono* (Curtin village #7; see Map 3), which Curtin describes as "[a] former Wintu village of 40 houses on the East bank of Sacramento River." Given the location of this village at a midpoint between the Sacramento River and the bend in Churn Creek coming closest to the Sacramento River, this village appears to be within that portion of Strawberry Hills proposed for the construction of a new casino resort. This is revealed by comparing the location of *Nosono* at that midpoint on Map 3 and the aerial photographs with project construction overlays in the *DEIS*, "Site Location (Alternative A)" and "Site Location (Alternative B)."

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Outdoor Sports Field
Hotel
Casino
Parking Garage
Line of Floodplain
SITE LOCATION (ALTERNATIVE A)

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(Cont.)



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Proper studies of this site, like those of *Kĕ'nkodi*, likely would reveal historical information and archaeological material as or more robust than that found at CA-SHA-266. Indeed, Curtin

estimates 40 Wintu households at *Nosono,* 10 more than at *Yonotŭmnomsono* (30 homes). The same is true for the remaining three villages in the chain to the south of *Nosono*: Curtin's village #6, *Kentiqĕ'ril* (or Kentigeril), "[a] former Wintu village of 25 houses"; Curtin's village #5, *Tcakkópûs,* "[a] former Wintu village of 10 houses"; and Curtin's village #4 *Nomdaltopi,* "[a] former Wintu village of 50 houses." These six villages would have regularly interacted in an inter-related, symbiotic manner with strong, interdependent economic and community ties. Thus, what affected one would affect all. This is particularly noteworthy because Curtin's village #4, *Nomdaltopi,* located opposite the mouth of Clear Creek would have been at or near the center of the Fremont massacre site of an estimated 1000 Native people in 1846. It is likely that every family in this six Wintu village chain would have had some direct involvement with that massacre. Given the frequency of Nomlaki visits to this area, particularly during the salmon runs, it is also likely that ancestors of the present day Paskenta Band of Nomlaki Indians perished in this massacre as well.

Until that unprecedented massacre, the riverine environment of the Sacramento River provided ample resources for sustained population expansion with the augmentation of Wintu technology freeing resource procurement and storage from seasonal constraints. Though the villages were permanent homes, seasonal hunting and gathering excursions into the nearby hills provided commodities not available at the River. These Wintu villages were occupied over many generations until the Fremont massacre and related policies aimed at annihilating the Wintu and other indigenous peoples in California forced the abandonment of their villages, and the survivors' retreat from their homeland. The large villages in this area demonstrate the density of population, which unfortunately drew genocidal attacks on whole villages, such as Fremont's 1846 massacre of up to 1,000 Native people (men, women and children), many of them Wintu, who were fishing for salmon and processing their catch. According to a consultant, the site of this massacre is approximately two miles south of CA-SHA-266: as noted the location of Curtin's village #4, *Nomdaltopi*. Fremont's attack was the beginning of a genocidal campaign against Indians that only increased in magnitude with the discovery of gold in 1848 at Coloma and Clear Creek. This phenomenon triggered the influx of hundreds of thousands of gold-seekers to the creeks and rivers of northern California. The consequences of this population explosion included the attempted annihilation of Native people in California, which continued with federal, state and local government sponsorship throughout the last half of the nineteenth century (see "Wintu Dispersal," below).

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In consideration of the forgoing, it is our opinion that the Strawberry Fields and surrounding areas likely contain burials from massacres, both reported and unknown, which are distinctly different from the formal cemeteries of Indian villages. Our above-referenced reviews of the historical material, coupled with our interviews of a consultant who was involved in re-burials from CA-SHA- 266, one of which was re-interred just north of the Strawberry Fields, confirm this opinion. Thus, the potential for extreme cultural resource sensitivity of the Strawberry Fields location cannot be overstated (Field Data 2018-19).

Wintu Dispersal

The Wintu people continue to exist, and they identify the Strawberry Fields site as located in their indigenous homeland. The Interior Department's *Scoping Report: Redding Rancheria*

Fee-to-Trust and Casino Project (May 2017) includes 14 comments letters from individuals stating that Strawberry Fields is Wintu territory. The *Scoping Report* also includes a transcript of testimony from Wintu Tribal Council member, Gene Malone, who testified at the Public Hearing that Strawberry Fields is the indigenous territory of the Wintu.

While indigenous to Strawberry Fields and surrounding areas, the Wintu suffered greatly from their contact with non-Indians and this led to their dispersal. This is important context for completing Wintu history in relation to Strawberry Fields.

Epidemics and the Fremont Massacre

John Work, a Hudson Bay trapper travelled through the Shasta County Wintu area in 1830-33 and noted many Indians who often fled at their sight. Work found Indians camped on the "big river" [Sacramento] on his trip down the valley. He wrote that the Sacramento River had many Indian villages which, in the spring were full of salmon being cured. On his return up the river Work found villages depleted from a malaria epidemic (1833) now believed to have been introduced by his expedition (Smith 1995:4-5). This epidemic severely reduced the Indian population in the central and upper Sacramento Valley (Cook 1943:315).

The Strawberry Fields site would have been heavily impacted by the epidemic which caused a dramatic drop in population, but nothing would be as tragic to the Wintu (or any California Indian group for that matter) as the entry of John C. Fremont. He arrived March 30, 1846 at Peter Lassen's ranch where he heard that 1000 Indians were making plans to attack white settlements; Fremont was asked to attend to them. With seventy-six men fully armed they approached the site near present-day Redding where they saw a group of Indians (estimated from 400 to 1,000 persons, primarily women and children) at "a tongue of land between the bends of the river." The Indians were surrounded and estimates of the "butchery" that followed ranged from 120 to 1000 Indian people killed that day. Many tried to flee but the river was swollen by snowmelt making it difficult to cross, but it is estimated that 200 to 300 were killed in the river. No one in Fremont's party was killed.

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According to consultant data this massacre area is about 2 miles south of *Yonotŭmnomsono* (Curtin's village #9 CA-SHA-266). This area was important for fish procurement where many Wintu groups assembled twice a year to secure the spawning Chinook salmon for processing for winter use. After the massacre, Fremont noted the abundance of salmon, and his party camped there and consumed the abundant Indian larder they found at the site (Madley 2016:43-48, 523 [Appendix 5]; Smith 1995:8-9); Field data 2019). It is likely that Wintu from all six villages within and adjacent to Strawberry Fields, described above, were assembled in this Sacramento River area south of Redding where the river was narrow, cold with rapid flow, and had an abundant salmon run twice a year.

This "first" Fremont "genocidal" massacre (1846) may have been one of the largest but least-known massacres in US history (Madley 2016:48). This and other such massacres would, according to the non-Indian invaders, teach Indians not to challenge whites. Fremont subsequently ordered that any Indian should be killed on sight; many fights ensued, and many Indian scalps taken for pay. The intent was to kill all the adult males they could find and many

gruesome massacres occurred throughout Wintu territory by organized "killing squads." Many non-Indians left mining for the more lucrative "head hunting" (Madley 2016:197-8; Tables 1-7). "The state government had spent millions of dollars in the 1850s paying for the expenses and wages of volunteer companies and the state militia" (Lindsay 2012:237). Because of the high cost in California, "Congress turned the state's genocide campaign into a federally supported program" (Madley 2016:253). Fremont's first massacre set the "style" for subsequent mass killings (Madley 2016:45).

White Settlements, the Gold Rush, and Militias

Pierson B. Reading had received a Mexican land grant ("Rancho Buena Ventura") in 1844 on the west side of the Sacramento River extending from Salt Creek (Redding vicinity) in the north to Cottonwood Creek in the south; 3 miles wide east to west, nineteen miles north to south bordered by the Sacramento River, and consisted of 26,632 acres. A portion was directly across the river from Strawberry Fields and its presence likely had an impact on the adjacent Wintu villages. Reading cultivated a portion of the land using Indian laborers who also lived on the Rancho. His rancho had two Indian villages with a total of about 150 men, women, and children (Smith 1995:8). In 1851, he reported that he employed about 500 Indians "who live in the vicinity" of his ranch, a portion of which is directly opposite the river from Strawberry Fields, and therefore, Wintu villages *Yonotŭmnomsono*, *Kĕ'nkodi*, and *Nosono*, described above (Smith 1995:23). Reading also housed military forces to be used against the Indians until Fort Reading was established on the west side of Cow Creek in 1852.

O. M. Wozencraft, U. S. Indian Commissioner, facilitated a Treaty of Peace and Friendship signed at Reading Ranch August 16, 1851. Although five tribal groups were invited, the Wintu and Yana were the only ones in attendance. The "Okwanuchu, Hat Creek, and Pit River" although invited, did not attend. The Wintu "tribes" south of the Pit River, entered into this agreement but the treaty was never ratified by Congress. During this period the federal government, while subsidizing genocide, was in the treaty-making process in order to remove Native people from their territories during the continued invasion by miners and settlers.

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In 1850 the California legislature passed a law that stated that an Indian, declared a vagrant, could have his/her labor sold for a period of years, transferring Indians into virtual slavery. This "Indenture Act" was repealed in 1863 but continued in local areas such as the Sacramento River area of Shasta County. Smith (1995) details the many difficulties encountered between the Wintu and their non-Indian neighbors throughout Shasta County from this early 1850's time with reports of theft, killings, children stolen for labor, and various troubles between Indians and whites. By 1858-1859 many natives were killed and about 300 were sent to Mendocino Reservation located on the coast. Indian starvation, as a result of loss of land and food resources continued for Wintu well into the latter part of the 19th century.

The 1864 banishment of Indians from the east side of the Sacramento River in Shasta County was reported by the local newspaper (Shasta Courier October 8, 1864 in Smith 1995:109). Known as the Millville Resolutions, it forbade any Indians from living within the boundaries described by a committee of five men in Millville east of Redding. One of the Resolutions specified, "That if any Indians are found within the boundaries described in the first resolution it

shall be the privilege of our company or citizens to exterminate or expel said Indians" (Smith 1995:109). The citizens of neighboring Churntown responded with their own unanimous resolutions: "That we consider the resolutions adopted in relation to Indians . . . at Millville . . . not only inconsistent with humanity but directly in opposition to the best interests of the people of this portion of the county" (Smith 1995:109). A further Resolution solicited the cooperation of local law enforcement "to assist in preventing any further disturbance among the Indians . . ." (Smith 1995:110).

The historical record documents unrelenting assaults on the indigenous population, throughout the first half of the nineteenth century, reaching a violent crescendo in the 1850s and 60s. It is highly likely that the known villages within and adjacent to the Strawberry Fields would have been abandoned during these decades, as the attraction of exceptional fishing there was overridden by the threat of violent death. It is likely that these villages would have been burned as part of a scorched earth policy among vigilantes and soldiers of fortune hunting for Indians at that time. This pervasive threat drove survivors into the foothills creating mobile refugee groups surviving on limited resources outside their traditional territory. Thus, the Wintu dispersed from their homelands, including the six villages within or adjacent to the Strawberry Fields site and the present day Redding Rancheria, areas marked by their suffering from concerted genocidal policies and actions. This is why the federal government could so easily accept individuals from disparate tribes (like Pit River and Wailaki) to take up residences on the 30 acres of the Wintu's Bald Hills (Daunom) territory, the present day Redding Rancheria.

The attempted elimination of Indian people, especially Wintu, from Shasta County is stated by Lindsay in "Murder State: California's Native American Genocide, 1846-1873":

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> When one considers the actions of the press, state and federal governments, and the citizenry as a whole, the result was the creation of an inescapable system of democratically imposed genocide that legalized and naturalized such atrocities as acceptable, commonplace occurrences, devised to fulfill the demands of the newly minted citizenry of California. . . . Native peoples in California became the object of the most destructive forces that a democratic system could contrive, and only barely survived through tough, extended resistance [Lindsay 2012:31].

Lindsay remarks that although Native Americans had a "shaky foothold" and were severely decreased in population during the last half of the 19th century they proved strong enough to recover in the ensuing twentieth century (Lindsay 2012:31). Such was the case for the Wintu who "learned to let the Americans well alone" and survived by retreating into the mountains, thereby losing their fishing grounds (Kardell 1980:9 quoting Powers 1874:530-31). Here they hoped not to be located by the marauding non-Indians who had orders to shoot to kill on sight. In 1864, a local newspaper, The Shasta Courier, observed that Indians who had lived in peace have been exterminated, and "The Indians about Shasta and in other locations in the county alarmed by the exterminations are fleeing to the mountains for safety" (Hunt 1960 as quoted by Johnson and Theodoratus 1984:233).

The Indian residency in Shasta County continued to rapidly decline during the latter part of the 1800s due to starvation and disease brought by non-Indians to a population with few immunities

to such diseases. Lapena, using Cooks' 1943 data and that from Toyon-Wintu Center figures, shows a decrease from pre-contact population of 14,250 to 395 in 1910 (LaPena 1978b:8). By the early 1900s Shasta County farmers were in need of employees to harvest fruit and other crops in the area. By 1909 it was reported that 2500 people, half of whom were Indians, many from Pit River, were working on ranches south of Strawberry Fields near Cottonwood (Smith 1995:172).

The Wintu Today

The Wintu have survived, at first dispersed to escape systematic genocide, but eventually congregating in small communities, and they have more recently, especially since the 1920s, advocated for their tribal losses and heritage. They are now organized into three groups (or bands) from various ancestral areas. They maintain a strong interest in their cultural past and intense concern over what once was their tribal territory. Each is actively seeking federal recognition.

The Wintu Tribe of Northern California maintains and operates the California Wintu Cultural Resource Center and Museum at Shasta Lake. It is represented by an elected Tribal Council and is in the process of completing a petition for federal recognition.
See https://wintutribe.org/. It claims ancestral lands for all Wintu peoples. In 1971, it was taken over by the BIA, and its members have prevailed in invalidating criteria for their participation in federal Indian education programs. *See Malone v. Bureau of Indian Affairs,* 38 F.3d 433 (9th Cir. 1994).

The Winnemem Wintu are located on the McCloud River northeast of Strawberry Fields. See http://www.winnememwintu.us/. This Wintu group has, in the past, entered into agreements with the United States Forestry Service for the protection of cultural resources within Shasta-Trinity National Forest. *See Winnemem Wintu Tribe v. U.S. Department of Interior,* 725 F.Supp.2d 1119, 1127 (E.D. Cal. 2010).

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The Nor Rel Muk Wintu Nation is the most westerly of the Wintu with an office in Weaverville, Trinity County. Its members are active in Wintu cultural resource preservation and protection. Some are related to Bald Hills Wintu.

The Redding Rancheria

<u>The Purchase of Land For "Homeless Indians"</u>

The 1905-06 Kelsey census showed that many Indians lived in the Redding area and had a need for a living site there (Kelsey 1971). Indian people came to the area as seasonal workers on the various ranches and camped in different localities while occupied in their seasonal employment. In May 1922 Redding area Indians were under the Greenville (Plumas County) District BIA headquarters. Kriegh (Redding District) wrote Miller (Greenville District) that the BIA had received an option to purchase a tract of land for homeless Indians on the north side of Clear Creek. Kriegh stated that the land is in an optimal position, is located on a state highway, is bounded by an irrigation system (water supply/Anderson Ditch), has firewood, room for gardens, could furnish a half dozen homes, and is in an area where they could work in wood cutting or

fruit picking. This parcel is close enough to the Redding Office (4 miles) that the Rancheria can be "watched." The land is located on the former Pierson B. Reading land grant (Letter, W. S. Kriegh, Clerk, Redding District to Edgar Miller, Superintendent, May 29, 1922, NA, Box 45, F310).

The BIA officials expressed concern over who, if anyone, would come to this new land purchase for Indians. This concern continued through the first few years of the Rancheria establishment. Kriegh remarks that if the Indians will use the land, the price is low, but if not used, the price is high (Kriegh to Miller, June 3, 1922, NA. Box 45. F310). The purchase of 30.887 acres was approved by F. M. Goodwin, Assistant Secretary of the Interior, June 24, 1922. The cost was $3860.87 (NA, Box 45, F310).

This site is located on Bald Hills (Daunom) Wintu traditional lands. A feature of the site is that before contact, "Indians had their camp at this same location and some of the old mounds and pits, together with the sea shells are still to be found" (Courier Free Press, April 23, 1923, NA, Box 45, F310). This shows that this site would properly be designated as pre-contact Wintu territory. There is no information in the BIA record that the Rancheria was knowingly placed on an archaeological site, however, the above newspaper comment on mounds, pits and sea shells indicates this to have been an unrecorded archaeological site. Rancheria parking lot expansion in 1999 exposed this unrecorded archaeological site, which also contained a cemetery. Test excavations were requested and trade beads, artifacts and human remains were encountered in a concentrated area. At the conclusion of the excavation, the site area was covered and became a fenced cemetery with a buffer around the periphery (Trudy Vaughan, Archaeologist, Personal Communication).

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Miller writes the Commission October 14, 1922, that the "grounds are admirably located for the camping fruit-picking Indians who come from all over Northern California to earn good wages picking fruit in the Sacramento Valley in the summer time" (NA, Box 45, F310). He believes if they are on government ground they can be protected from "undesirables . . . " Miller again writes Kriegh, January 17, 1923 concerned about the number of Indians they can get on the land to divide the water bill of $120 per year. If none went on the land the $120 ($4 per acre) would be "paid out for nothing." The number who come (if any) would need to divide the bill. Miller sees the water rights matter "to be a mess we should have avoided" (NA, Box 45, F310). The water concern is an issue through 1923 and the discussion continues over the uncertainty over how many Indians will occupy the land although the BIA is assured that some Indians are always in the area working.

Working for others is almost entirely the means of livelihood of these Indians. No doubt they would be on the tract part of the time and gone part of the time, but it would be a place to which they could return when they wished to or had no other place to stay (letter Kriegh to Miller, January 18, 1925 NA, Box 45, F310).

A letter from Greenville (not signed, presumably from Miller) January 25, 1923 states that in three years they hope to have a number of permanent homes on this land. These would be Indians who do not have "enough money to purchase land but enough to put them in a good cabin" (NA, Box 45, F310). A Redding newspaper, Courier Free Press, announced the land sale

April 23, 1923 noting that the land is to be fenced and buildings erected for availability to Indians and that the place can be "a headquarters or stopping place for any of the Indians who come into the Valley from the surrounding country to work in the fruit and on the farms." The paper sees the property a credit to the community with the availability of water and soil adapted to vegetable growth.

Assistant Commissioner, E. B. Meritt wrote Miller (Greenville Agency) July 27, 1933 regarding improvements on the land purchased "for homeless Indians" (NA, Tribal Group Files 1915-1972). In July 1923, it was suggested that the tract be well fenced (hog wire topped with barbed wire) to keep out trespassers and "to restrict the Indians to proper bounds." Yet continuing uncertainty prevailed as to who would live there (NA, Kriegh to Supt. Miller, August 7, 1923). In a letter from Miller to the Commissioner of Indian Affairs, July 12, 1923, Miller states "The Indians are not waiting to settle on this land. They will have to be encouraged." He states that poverty and old age, as well as large families could be factors in settlement (NA, Box 45, F310). A letter to the Commissioner of Indian Affairs from Greenville (not signed) notes that the land is in a splendid location and believes they can have homes on the land in three years. They have enough money to put the Indians in a "good cabin" (NA, Box 45, F 310). In 1925, the BIA planned a sign over a gate facing the State Highway to read "Property of the United States, for Homeless Indians or something to that effect." They suggest that 50 Indians can be accommodated in cabins with gardens (NA, letter, Kriegh to Miller, July 10, 1925).

In 1936 a highway Right of Way crossing the Rancheria was approved (NA, Mar 31, 1936). At some point, three homes designated for older people were constructed on the Rancheria either by the Bureau of Indian Affairs or Shasta County.

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The Rancheria was often referred to in the early years of its existence as the Clear Creek Rancheria after the Creek adjoining the property. In recent years it is referred to more often as the Redding Rancheria. The legal description of the Rancheria was made through a survey and the boundaries clarified for a Mr. Wm. H. Card, May 23, 1936 who appears to have questioned the boundary (NA, letter, O. E. Lipps, Superintendent to Wm H. Card, Redding, NA, Tribal Group Files, Box 4, Folder 1923-1929).

Many of the persons who resided at the Rancheria are mentioned in various letters, memos, etc. in the National Archives records. When possible, research has been conducted in the 1928-1933 California Indian Roll to determine tribal affiliations of the various residents mentioned in the Archive records. This must be done with care, since it has been found that Distributee women often state their husbands' tribal affiliation as their own. For this reason, further research has gone beyond the 1928-1933 California Roll for tribal affiliations. Birth, death and other records have been examined. Tribal affiliations found in Distributee backgrounds have covered a range of tribes: Pit River, Wintun, Wailaki, Maidu, Paiute-Shoshone, Yana, Karuk, and Yurok.

By the early 1930s, the Sacramento Area Office had records of requests for occupancy on the Rancheria. These data show that the BIA makes the decisions about who can reside there, but after 1939, a Rancheria Council voted on a written request for residency and forwarded these requests to the Sacramento Area Office for approval. Various BIA communications through the years up to 1939 stress that the Rancheria is made for "homeless Indians." The earliest

occupants on the Rancheria have been difficult to discern since data on the years prior to 1933 were not located in the Redding Rancheria files at the San Bruno National Archives under Redding or Clear Creek designations. It is not known who or how many people came to the property in the Rancheria's earliest years.

Data show that prospective residents would have been required to build their own homes, although assistance for materials may have been provided from Shasta County. The County built three homes that were designated to be used only by elders. The BIA continued this restriction on these three homes through subsequent years. It is not known how the earliest residents gained access to the land. The first known request to the BIA for a living site occurs in 1933 from a Pit River woman. This request required discussion by the BIA since her husband was Mexican, but since another woman resident from Pit River had a Mexican friend often at her home the request was granted. The woman was told she had no rights until she had constructed a home, after which the government would issue her a "certificate of use and occupancy consideration."

The problem of recognizing inter-ethic marriages continued to exist. Another Pit River woman requested an assignment in 1938 but was told there was "doubt" whether any vacant lots existed as well as doubts that residents would approve her Mexican husband. At this time all adult residents would need to sign a petition of approval and submit this petition to the BIA for government approval. The residents are not revealed. Other issues surrounding housing restrictions were ongoing. For example, in 1938, a Wailaki man and his wife (Wintu) requested permission to build an addition to their "little cottage" which had been built by the government. This would allow her mother a place to stay when she was not at Baird (McCloud Wintu tribal area). This was not approved because the mother had a home in Baird.

T6-98
(Cont.)

Early in 1939, the BIA received complaints from a Pit River man about unauthorized wood cutting on the Rancheria. He was also concerned about another Pit River man moving there when he had land at Big Bend although the man's mother (Pit River) resided at Clear Creek with, according to the complaint, too many overgrazing goats (NA, Tribal Group Files Box 45, folder 1915-1972). It was made clear that if a person had another residence, they were not a desirable candidate to reside at Clear Creek. These sorts of complaints continued throughout the early years of the Rancheria.

The First Governing Organization

The "Clear Creek Community" had no structure to function as any kind of organization until 1939. The first meeting of the "Clear Creek" Community was conducted September 25, 1939. Michael Harrison, BIA Field Aid, attended this meeting at the Rancheria to discuss a contract with Pacific Gas and Electric to purchase power for the Rancheria. Harrison stressed that the main object of the meeting was to get the Clear Creek group organized. He told the group that the various problems they have been facing would be overcome by getting organized. The attendees unanimously decided to organize immediately deciding that only "actual residents" would be recognized as their group. This was the first meeting of the "Clear Creek" Community as declared in the minutes signed by Chair Ernest Ward and Secretary Minerva Philpot. Officers were elected at this time:

Ernest Ward, Chairman [Wailaki]
Minerva Philpot, General Secretary [Wailaki]
Ruel Hayward, Officer [Wintun]
Katherine Stieber, Officer [Wintun/Maidu]
Dudley Philpot, Officer [Wailaki]

These officers served as an Executive Council that met in addition to regular community meetings (NA, Meeting minutes, Clear Creek, Sept. 25, 1939, Box 45, Tribal Group Files 1915-1972).

The "First Executive Meeting of the Clear Creek Council" was held September 29, 1939. It was declared that the community organizations are to be known as the "Clear Creek Council" which meets the last Friday of each month. It was decided that By-Laws would be the first step for the Council and are stated as follows:

> ANYONE wishing to reside on this Ranceria [sic], must make APPLICATION to the BOARD OF COUNCIL. This Application must be made in writing.

They also posted a speed limit of 15 miles per hour on the Rancheria, people were to be responsible for their stock; all residents must be involved in cleaning the Rancheria grounds, federal regulations regarding federal liquor restrictions are to be enforced, community official business must be posted on a central bulletin board, communications are to be submitted to the Secretary, and the central road will be aligned cleared and maintained (NA, Box 45, Tribal Group Files 1915-1972).

T6-98
(Cont.)

The second Executive meeting of the Clear Creek Council was held October 2, 1939 at Mrs. Stieber's home by Chairman E. Ward, Minerva Philpot (Secretary), and Katherine Stieber. Officers absent were Dudley Philpot and Ruel Hayward. A motion was made and approved to "start up their PREAMBLE and CONSTITUTION (NA, Tribal Group Files, Box 24, folder 1923-1938). A council meeting December 5th, 1939 discussed content of the Constitution Articles and stressed that the group should be "self-governing, as long as the Sacramento Office approves it" (NA, Tribal Group Files, Box 24, folder 1923-1938).

Termination, Restoration, and Current Membership Make-Up

On August 18, 1958, Congress passed the California Rancheria Termination Act, Public Law 85-671 and thereby terminated a number of California tribes, including Redding. Twenty-six years later, on June 11, 1984, however, the Rancheria gained federal recognition by the terms of the settlement of *Hardwick v. United States,* No. C79-1710 SW (N.D. Cal.). The Redding Rancheria dates its termination by the federal government as July 6, 1959. See http://www.redding-rancheria.com/tribal-history/.

Seventeen families on the Rancheria received title to the property and homes on which they resided, providing each of them property as individuals rather than as a tribe. Deeds were issued to seventeen individuals and to an association which was to manage the community properties (Act of August 18, 1958; 72 Stat, 619, as amended). The Tribe lists seventeen Distributees and

refers to them as "original Distributees who owned land on the Redding Rancheria." This residential area was called "the flat." Our genealogical research (including review of birth, death, censuses, obituaries, cemetery records, and consultant data) establishes that the descendancy of the Rancheria Distributees is a mixed descendancy from several California groups with the largest ancestry from the Pit River group of tribes (11 autonomous tribes) followed by Wintu descendancy. Other tribal groups represented in the Distributees' ancestry are Wylacki, Maidu, Paiute-Shoshone, Karuk, Yurok, and Yana. Many individuals are of mixed ancestry.

* * *

We have been asked when the Rancheria first established a government. This was on September 25, 1939, when the "Clear Creek" Community had its first meeting as described above in order to discuss a contract with Pacific Gas and Electric.

The Rancheria had no governmental structure until the residents came together for a meeting on September 25, 1939 to elect officers. Before that, the Rancheria had no functioning government; it was simply a neighborhood of homes with no organization to represent the residents. These residents, having no organizational structure until September 25, 1939, could not have had a government-to-government relationship with the United States until that date, at the earliest.

T6-98
(Cont.)

Finally, we have been asked whether the Redding Rancheria, *qua* tribe, has a significant historical connection to Strawberry Fields. The Rancheria, *as a tribe*, has a significant, relatively modern, historical connection only to the 30 acre parcel that the United States purchased for homeless Indians in 1922. Members of the Rancheria descend from a variety of tribes that are indigenous to northern California, and they may have historical connections to the respective aboriginal homelands of those tribes. For example, recently deceased Redding Chairwoman Barbara Murphy, of Pit River descent, expressed her desire to be buried at Pit River. (Record Searchlight, May 10, 2018.) The Redding Rancheria is unique. Collectively, the authors of this report jointly share 80 years of experience studying the indigenous peoples of northern California. We know of no other Indian tribe in California that was created and located for "homeless Indians" in the location of their migrant work. The rancheria settlement by other California tribes, such as Ione and the Wilton Rancherias, serve local economic interests in their historical development. But these tribes, unlike the Redding Rancheria, have remained within their indigenous homelands.

As described in the first section of this report, the Wintu people, represented by the Wintu Tribe of Northern California, Winnemem Wintu, and the Nor Rel Muk Wintu Nation, have a significant historical connection to Strawberry Fields; it is Wintu indigenous territory. While members of the Redding Rancheria with Wintu ancestry may claim, as individuals, that they have a significant historical connection to Strawberry Fields because they are connected to the Wintu, and, therefore, Strawberry Fields, the Redding Rancheria, *qua tribe*, has no such connection.

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ADDENDUM 1

RESUME

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Wilton Band of Miwok, Elk Grove, CA, ethnohistory, 2015-ongoing
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Kitanemuk, Tatavian, Santa Susanna Project, CH2MHill 2016 Chumash, Gabrieleno
Enterprise Rancheria, Oroville, CA, Maidu (Concow) history, issues, 2012
Ione Miwok Tribe, Plymouth CA: Fee to Trust Case (work with attorneys and tribe), 2004-10; Several research projects on tribal history, geography and issues 2008-2010
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Education

Ph.D., 1971 Anthropology, Maxwell Graduate School of Citizenship and Public Affairs, Syracuse University, Syracuse, New York. Dissertation: Identity Crises: Changes in Life Style of the Manchester Band of Pomo Indians, Point Arena, CA.

Undergraduate: University of Washington, Seattle, 1953-1956; California State University, Sacramento, 1959-1962, BA 1961 (Anthropology, Geography, Art).

Certificate, Historic Preservation Law, University of Nevada, Reno, Cultural Resources Management Program, 1992.

Professional Societies (no longer active)

American Anthropological Association, Fellow (-1994) Associate Editor for Applied Anthropology, 1983 Annual Meetings, Chicago. Committee to Investigate Anthropological Concerns on the Peripheral Canal, 1982

Southwestern Anthropological Association, Fellow; President 1987; Executive Board 1980-1982; Chair, Women in Anthropology Committee 1981-1982; Chair, Publications Committee 1980 - 1991

Society for Applied Anthropology, Fellow; Ethics Committee 1981-1982; Presidential Nominee 1981-1982; Chairperson 40th Annual Meeting, 1980 Denver; Social Impact Committee 1977-1980; Annual Meeting Committee 1977-1978; Chairperson 37thAnnual Meeting, 1977 San Diego (1990)

American River Natural History Association, Board of Directors, 1979-1991

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1991 Indian Uses of Sea Products on the North Coast of California. With Anne Poitras. California State Department of Parks and Recreation, Sacramento, CA.

1990 Wintu Sacred Geography. Invited paper for Conference on California Indian Shamanism,

May 1990 at California State University, Hayward. (Also presented at the 1991 California Indian Conference, Riverside, CA; Women In Anthropology Conference, CSUS, 1992)

1990 Mirage of Honor; The 1851 Treaty at Camp Barbour, California, (Video) Associate Producer with Producer Sandra Helland. University Media Services, California State University, Sacramento (12 minutes).

1990 Cultural Background Information on Case No. 7909 (The People of the State of California, Plaintiff, vs., DDK, Defendant), for Gehrke's Investigative Services, Fresno, CA and Eric Green, Attorney at Law, Fresno, CA. Theodoratus Cultural Research, Fair Oaks, CA

1989 Solano Woman, Associate Producer, Video tape program produced for the Vacaville Museum, Vacaville, CA. Theodoratus Cultural Research (21 minutes).

1989 Klamath River Canyon Study. Report for the USDI, Bureau of Land Management, Portland, Oregon BioSystems Analysis, Inc., Santa Cruz, CA (To be published in Portland BLM Anthropology Series).

1989 Susanville Rancheria Arts Program A Video Presentation for the Lassen Arts Council, Associate Producer with Producer Sandra Helland. Theodoratus Cultural Research.

1989 Historical Overview, Yuba River Basin, Project Alternatives, (Historical Section with Dian Self). Report for the Department of the Army, Corps of Engineers, Sacramento District, Sacramento, CA. BioSystems Analysis, Inc., Santa Cruz, CA

1989 "Update on Point Arena Roundhouse, with Richard Jenkins, News From Native CA, March/April 1989, p. 13.

1988 Frank LaPena, Artist and Wintu Traditionalist, A Video Program produced with Carla Hills. Theodoratus Cultural Research (12 minutes).

1987 G-O Road: Northwest California Religion Case to be Reviewed by Supreme Court. News From Native California, Vol. 1, No. 5, November/December 1987.

1987 Preserving the Point Arena Roundhouse. News From Native California, Vol. 1, No. 4, September/October 1987.

1985 A Walk Through Yesterday. Video tape program produced for the Vacaville Museum, Vacaville, CA. Theodoratus Cultural Research (21 minutes).

1985 The Extension of Tradition: Dedication. Video tape program produced in cooperation with the Crocker Museum, Sacramento, CA. Theodoratus Cultural Research (20 minutes).

1985 Tradition: A Contemporary Perspective. In, The Extension of Tradition: Northern California Native American Art in Cultural Perspective, pp. 38-43, Co-author. Frank R. LaPena and Janice T. Driesbach, editors. The Crocker Art Museum, Sacramento, CA.

1985 Central California Indians. Co-author. In, Masterkey 59(2,3):4-11 Summer/Fall, Special Issue:

People of California. Southwest Museum, Los Angeles, CA.

1985 Black Butte Lake: An Oral History Sampler. Video tape program prepared for the U.S. Army Corps of Engineers, Sacramento District. Theodoratus Cultural Research. (21 min)

1982 Ethnography and History in Preservation Research: Views of CRM in California. In, Contract Abstracts, Vol. 3, No. 1.

1980 Ethnography in Cultural Resources Management. In, Third National Conference, Task Force on Recreation Use and Resource Management of the Edison Electric Institute. Washington, DC: Edison Electric Institute.

1978 Western Pomo and Northeastern Pomo, (co-author, Lowell J. Bean) In, Handbook of North American Indians, Volume 8: California. Edited by Robert F. Heizer. Washington, DC: Smithsonian Institution.

1974 Cultural and Social Change Among the Coast Central Pomo, California Journal of Anthropology, Volume 1, Number 1.

Conference Presentations and Participation (a partial list)

Active participant in professional meetings, presenting papers on topics such as ethics and cultural resource studies, anthropologists as expert witnesses, development and CRM, religious freedom, burial/reburial issues, methodological problems in heritage preservation, Native American tradition, ethnicity and heritage conservation, dilemmas in data integration, and social impact assessment.

1993 A Retrospective on Thirty Plus Years as a California Ethnographer. In, Plenary Session, The Past is But the Beginning of a Beginning. Eight California Indian Conference, Berkeley, CA.

1993 Off Reservation Land Rights: A Comparative Analysis. Invited Session, The Politics of Heritage: Native American Issues in Contemporary America. Eighth California Indian Conference, Berkeley, CA.

1992 A Perspective on Traditional Sites. Invited speaker, Plenary Session, Society for California Archaeology, Pasadena, California, April.

1991 Invited Statement, Participant, Legacy Resource Management Program, Department of Defense Working Group on Traditional Places and Archaeological Sites. Washington, DC, November.

1987 C. Hart Merriam's View of the California Indian Condition, 1898-1935. Invited paper, Session: California Indian Ethnohistory, American Society for Ethnohistory, Nov. 6, 1987, Berkeley, CA.

1987 Cultural Resource Training Session. USDA, Sequoia National Forest, Porterville, CA.

1987 Program Committee: The Third California Indian Conference, October 16-18, 1987. Santa Barbara Museum of Natural History, Santa Barbara, CA.

1987 Session Organizer: Indians and Anthropologists Working Together. The Third California Indian Conference, October 16, 1987. Santa Barbara Museum of Natural History, Santa Barbara, CA.

1987 Cultural Resource Training Session. USDA, Sequoia National Forest, Porterville, CA.

1985 Removal and Reburial of Human Remains from CA-TEH-10, Black Butte Lake, Tehama County, California. (co-author) Invited paper, Session: Ethnoarchaeology, Society for California Archaeology, San Diego, March 29, 1985.

1985 Cultural Resources in the Assessment of Development Projects. Sacramento Association of Applied Sociologists, March 26th, 1985.

1984 Workshop organizer with Omer Stewart and Florence Shipek: Anthropologist as Expert Witness. Annual Meeting of the Society for Applied Anthropology, Toronto, Canada, March 14, 1984.

1983 Organizer with Benita Howell: Recent Perspectives, The American Indian Religious Freedom Act (PL 95-341). Invited Symposium for the Committee of Anthropologists in Environmental Planning, American Anthropological Association Annual Meeting, Chicago, Nov. 17-20, 1983.

1983 Paper presented: Gasquet-Orleans: View from the End of the Road. For, Invited Symposium, Recent Perspectives, The American Religious Freedom Act. American Anthropological Association Annual Meeting, Chicago, Nov. 18, 1983

1983 Invited Organizer and Discussant: Development and Archaeological Sites in the West. Conference: "Reusing Old Buildings: Preservation Law and the Development Process," June 26-28, 1983, San Francisco, CA. Sponsored by The Conservation Foundation, The National Trust for Historic Preservation, and the American Bar Association.

1982 Paper presented: The Dutch Gulch Lake Project: A View of Methodological Approaches to the Study of Prehistoric Populations through Great Depression Populations. (with Jerald J. Johnson) for Symposium, "Cultural Resource Management and the U.S. Army Corps of Engineers," Society for American Archaeology, Annual Meeting, Minneapolis, MN.

1982 Invited Paper: Cultural Conservation: A Case Study in the Sierra Nevada. For Symposium, "Cultural Conservation and Environmental Planning" (Library of Congress Folklife Center), American Anthropological Association, Annual Meeting, Washington, DC.

1983 Discussant: Symposium, Native American Religious Freedom: Conflicts and Accommodations. American Anthropological Association, Annual Meeting, Washington, DC.

1982 Symposium Organizer: Recent Findings in Sierran Anthropology. Southwestern Anthropologi- cal Association, Annual Meeting, Sacramento, CA.

1982 Symposium Organizer: Employment of Women in the Public Arena. For Women in Anthropology Committee, Southwestern Anthropological Association, Annual Meeting, Sacramento, CA.

1982 California Anthropology and Native American Tradition. Paper Presented for the Ethnic Studies Lecture Series, California State University, Sacramento, CA.

1981 Invited Paper: The Present Status of California Ethnohistory: Tradition as Change, University of Uppsala, Sweden, Department of Cultural Anthropology, June, 1980.

1981 Paper Presented: Tradition and Ethnicity in Heritage Conservation. In Symposium, Conservation Ethnology, 1981 Annual Meeting of the American Society for Ethnohistory, Colorado Springs, CO.

1981 Workshop Facilitator with three other professionals: Social Impact Assessment: Scope and Potential. For American Anthropological Association Committee on Anthropology as a Profession, 80th Annual Meeting of the American Anthropological Association, Los Angeles.

1981 Workshop Facilitator: Ethnographic Research and the U.S. Forest Service, for USDA, Forest Service, Regional Office, San Francisco (full day workshop, October, Sacramento, CA).

1981 Paper Presented: Dilemmas in Data Integration. In Symposium, Cultural Studies at Warm Springs Dam--7 years: $2,000,000. 80th Annual Meeting of the American Anthropological Association, Los Angeles, CA.

1981 Discussant, Invited Session: Collaborative Research on Scientific Method. For the Society for Applied Anthropology, 80th Annual Meeting of the American Anthropological Assoc., Los Angeles, CA.

1980 Invited Paper: Ethics and Cultural Resource Studies. Workshop Conference on, Ethical Problems of Fieldwork, National Science Foundation, Springhill, Minnesota.

1980 Co-Chair, Symposium: Indian Heritage Preservation Issues. Paper Presented: Methodological Problems of Heritage Preservation: A Case Study, Society for Applied Anthropology, Annual Meeting, Denver, CO.

1980 Paper Presented: Ethnography in Cultural Resources Management. Symposium, Cultural Resources Management, Third National Conference, Task Force on Recreation Use and Resource Management, Edison Electric Institute, Portland, OR

1978 Symposium Organizer: Native California Indians and World Ethnology I: Current Research. Paper Presented: Coso Hot Springs: Traditional Healing or Geothermal Energy? Discussant in Part II: Spiritual Sites, 77th Annual Meeting, American Anthropological Assoc., Los Angeles,

1978 Chairperson, Symposium: Contemporary Ethnology, Southwestern Anthropological Society, Annual Meeting, San Francisco, CA.

1977 Participant, 2-day Symposium: Restoration of Equality in Indian-Anglo Decision-Making. Society for Applied Anthropology, Annual Meeting, San Diego, CA.

1976 Symposium Organizer: Contract Ethnographic Team Research. Paper Presented: Administration of Projects. Southwestern Anthropological Society, Annual Meeting, San Francisco, CA.

1973 Paper Presented: From Rancheria to Pre-Industrial Cooperative: An Analysis of the Cultural and Social Change Among the Coast Central Pomo. 72nd Annual Meeting American Anthropological Association, New Orleans. LA.

1973 Participant, Smithsonian Institution Symposium: Economic Development on American Indian Reservations. Southwestern Anthropological Society, Annual Meeting, San Francisco, CA.

Consultant Work, Cultural Resource Management, Expert Witness:

As Principal Investigator of Theodoratus Cultural Research (TCR), I saw extensive research projects to their completion (report list available on request). I directed large research teams in separate and combined studies of ethnographic, archaeological, and historical investigations. TCR reports included the impacts of hydroelectric power plants, gas plants, geothermal power plants, transmission lines, roads, pipelines, water systems, flood control, timber harvests, and city redevelopment. Studies ranged from general overviews (reconnaissance, inventory, evaluation) to specific problem solving, and included cumulative impacts, burial relocation, native consultations, organizing native involvement programs, and cultural brokerage tasks. I have continued research in these areas after TCR. The TCR work included over 95 research contracts from the following:

Federal

U.S. Army Corps of Engineers, Districts:
Sacramento, San Francisco, Los Angeles Districts

U.S. Department of Agriculture, Forest Service:
Shasta-Trinity National Forest, Redding, CA
Sierra National Forest, Fresno, CA,
Six Rivers National Forest, Eureka, CA
Stanislaus National Forest, Sonora, CA
Sequoia National Forest, Porterville, CA

U.S. Department of Defense, Washington, DC

U.S. Department of the Interior:
Bureau of Land Management, Redding, Susanville, Medford Districts
Inter-Agency Archaeological Service, Washington, DC
Heritage Conservation and Recreation Service, Washington, DC
National Park Service, Western Region, San Francisco

States

California Public Utilities Commission, San Francisco
California State Water Resources Control Board, Sacramento

California, Office of Historic Preservation
Montana Dept. Natural Resources and Conservation, Helena

Counties

Calaveras County Museum, San Andreas, CA
Calaveras County Water District, San Andreas, CA
Plumas County, Department of Public Works, CA

Cities

San Jose, CA, Redevelopment Agency
Sacramento City Redevelopment Agency

Utilities

Pacific Gas and Electric, San Francisco
Kings River Conservation District, Fresno, CA
Sacramento Municipal Utility Company, Sacramento
San Joaquin Power Authority, Turlock, CA
Southern California Edison, Rosemead, CA

Private Companies

Dames & Moore, San Francisco
David J Powers & Associates, San Jose, CA Ecological Analysts, Concord, CA
Environmental Science Associates, San Francisco, CA
Envirosphere Company, Division of EBASCO Services, Inc., Sacramento, CA
ESCA-Tech Corporation, Costa Mesa, CA
Fredericksen, Kamine & Associates, Sacramento, CA
Gehrke's Investigative Services, Fresno, CA
Gilbert/Commonwealth, Englewood, Colorado and Chicago
Jones & Stokes Associates, Inc., Sacramento, CA
Pacific Legacy, Santa Cruz and El Dorado Hills, CA
R. W. Beck and Associates, Seattle. WN
Southern Pacific Pipelines, Inc., Los Angeles, CA
Tuolumne Me-Wuk Tribal Council, Tuolumne, CA
Wirth Associates, San Diego, CA
CH2MHill, Sacramento Office, CA

Consultant to South Asian American Education Association, Stockton, CA. 1981-1982.
Administration of National Institute of Education funded study in Yuba City, CA. 1981-1982.

Expert Witness

Legal work, Upper Lake Pomo Association, et al. v. Gale A. Norton, et al. for Dickstein & Merin, Attorneys at Law, Sacramento. Attorney contact: Tony Cohen
Expert Witness, Pomo Interment Case, Mendocino County Court, Ukiah, 1993.
Expert Witness (Mono Indian culture), Fresno Superior Court, California, 1990.
Expert Witness (Indian religious freedom), U.S. District Court, San Francisco, Northern District of California, Docket No. C-82-4042, March 14, 15, 1983. (Cited by Supreme Court of the United States, Lyng, Secretary of Agriculture, et al. v. Northwest Indian Cemetery Protective Assn. et al., No. 86-1013.Argued Nov. 30, 1987--Decided April 19, 1988.)
Expert Witness (ethnic minorities), Superior Court, County of Sacramento, Department of Social Welfare, June 1980.

Museum Associations

Involvement with museums has been in the public presentation of research through lecturing, writing, and video production (3/4 inch broadcast quality) for the following:

CA State University, Sacramento, Anthropology Museum, Director, 1993-1994
Taught the Anthropology Department courses in museology.
Turtle Bay Museums, Redding, CA (both outdoor and indoor exhibits).
Calaveras County Museum, San Andreas, CA. (two NEH grants).
Chaw'Se State Historic Park (Museum), Pine Grove, CA. Lectures.
Crocker Art Museum Association, Sacramento. Lecture, publication, video.
DeYoung Museum, San Francisco. Lectures.
Redding Museum and Art Center, Redding, CA. Executive Council, Laboratory for cultural Resources Conservation and Research, speaker, NEH grant application.
Southwest Museum, Los Angeles. Writing.
Vacaville Museum, Vacaville, CA. Videos.
Pit River Tribal Committee assist in the establishment of a Tribal Curation Facility.
Hearst Museum of' Anthropology, University of California, Berkeley, Preparator.
Territorial Museum of Alaska, Assistant Curator.

RESUME
January 2019

Kathleen McBride

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EDUCATION:

M.A. Anthropology, California State University, Sacramento 1983
B.A. Social Science, California State University, Sacramento 1973

EMPLOYMENT HISTORY:

Heritage Resources Consultant

Wilton Rancheria, Ethnographic Overview of the Wilton Rancheria January 2019

Pacific Legacy, Inc., Ethnographic and National Register Evaluation Report, CA-ELD-49 at Bucks Bar Bridge, El Dorado County, CA.
January 2018

Sonoma State University Archaeological Studies Center, Kashaya Pomo Cultural Landscape Project, Sonoma County, CA. May 2015

Caltrans District 10 Office of Transportation Planning - Environmental Justice Tribal Collaboration Study, 2008 – 2009 for Kern County Council of Governments: 8 San Joaquin Valley Councils of Government. Tubatulabal Tribe, Lake Isabella, CA

Timbisha Shoshone (Death Valley) Fee to Trust application. 2006-2007

Ione Band of Miwok Indians. Documentation for the Tribe's qualification for a "Restored Lands" exception. November 2003 to June 2004; 2006-07.

Pacific Legacy, Inc. of Cameron Park, CA. Rob Jackson, Principal. June to December 2006

Sonoma State University – Archaeological Studies Center

Administrator II/Project Manager – Cultural Studies for Lake Oroville Relicensing, a project sponsored by the Federal Energy Regulatory Commission (FERC) and the California Department of Water Resources (DWR). October 2001 to October 2002.

California Department of Transportation – District 4

Consultant Environmental Planning/Cultural Studies January to June 2007. Grant writing proposal for Transportation Enhancement funds from the Federal Highway Administration, Kashaya Cultural Landscape Study.

Senior Environmental Planner/District Branch Chief Cultural Resources Studies, Environmental Planning Sonoma, Napa, Marin, and Solano counties. September 1997 to September 2001.

District Four Native American Coordinator. June 1996 to September 2001.

Heritage Resource Coordinator. September 1997 to September 2001.

Associate Environmental Planner. May 1989 to September 1997

YA-KA-AMA Native American Education and Development Center, Sonoma County, CA. Assistant Director for Grant preparation and job training program. September 1988 to April 1989.

Solano County Labor Market Survey, 1984, Solano County Office of Education.

Theodoratus Cultural Research, Research Associate.

Cultural Resource Management Studies 1975 to 1984:

Cultural Resources Overview Kootenai Religious Claims, Montana, Idaho and Canada, 1981-1983, State of Montana Department of Natural Resources and Conservation.

Warm Springs Cultural Resources Study, Sonoma County, 1978-1981 (intermittent), U.S. Army Corps of Engineers.

Cultural Resources Planning Summary and Field Work Proposal for Three Reservoirs" Locations: Contra Costa, Merced, Glenn and Tehama Counties, 1979, State of California, Department of Water Resources.
History of Sacramento City Block 6-7th, K-L Streets Sacramento, CA. 1977, City of Sacramento Redevelopment Agency.

Ethnographic Study of the New Melones Lakes Project Tuolumne and Calaveras Counties, CA., 1975-1976, U.S. Army Corps of Engineers.

Parks Bar Ethnographic Project Yuba and Nevada Counties, CA., 1975-1976, U.S. Army Corps of Engineers.

Professional Experience

Native American Research and Consultation:

Compilation of a tribal genealogy for the Kashaya Band of Pomo Indians with Dorothea Theodoratus Ph.D. Research included interviews with knowledgeable consultants as well as examination of public records and federally archived documents. 2010

Feasibility assessment of Fee to Trust Application for Timbisha Shoshone Tribe (Death Valley) with Dorothea Theodoratus, Ph.D. Sheehan Law Firm, Ocean Springs MI, October, 2007.

Preparation of a tribal genealogy for the Ione Band of Miwok Indians, with Dorothea Theodoratus Ph.D., August 2007. Ione, CA

Ethnographic and Ethnohistoric Overview for the Buena Vista Rancheria of Me-Wuk Indians, Amador County, California, co-authored with Dr. Dorothea Theodoratus, Robt Jackson, Jennifer Burns. Pacific Legacy, Cameron Park, CA, October 2006.

Ethnohistoric documentation establishing a "Restored Lands" exception under 25 USCδ 2719(b)(1) (B)(iii) for the Ione Band of Miwok Indians, 2004, co-authored with Dr. Dorothea Theodoratus

Preparation and administration of contracts with three federally recognized tribes to implement their full participation and job training in Cultural Studies for the Oroville Dam relicensing project (FERC and DWR), 2001-2002.

Native American Coordinator for all Caltrans projects in District Four's nine counties. Responsibilities included consultation with six federally recognized tribes (Kashaya Pomo, Federated Indians of Graton Rancheria, Dry Creek Pomo, Rumsey Band of Wintu, Lytton Band of Pomo, Cloverdale Band of Pomo), as the designated representative of the Federal Highway Administration.

Oversight for the preparation of memoranda of agreement among Caltrans, the Office of Historic Preservation, the Federal Highway Administration and federally recognized tribes for cultural resources projects in Caltrans District 4. 1996-2001

Coordination of Native American monitoring of Caltrans archaeological excavations, including consultation with the Native American Heritage Commission, negotiation of wages, fees and stipends with tribes and interested parties, and facilitation of monitor training for descendent communities.1996-2001

Project Management:

Environmental compliance and document preparation for Caltrans District 4 highway projects in Sonoma, Napa, Marin and Solano Counties.1995-2001

Management of cultural resources studies required for the relicensing of the Oroville Dam including Prehistoric Archaeology, Historic Archaeology, History and Native American collaboration with three federally recognized tribes.
Prepared and monitored contracts with tribes and consultants.2001-2002

Management of cultural resource compliance on an average workload of approximately 125 active highway projects for Caltrans District 4 Environmental Planning Office. 1997-2001

Administration/Supervision:

Administered a 6 million dollar contract with the Department of Water Resources for cultural studies and Native American consultation as Project Manager at the Archaeological Studies Center at Sonoma State University.2001-2002

Supervised a staff of seven journey person professionals including archaeologists, architectural historians, and environmental planners. Responsible for oversight of products of consultant contracts for cultural resources studies and tasks. Supervised the preparation of technical scopes-of-work and schedules, tracking budgets, and quality

control on consultant deliverables. Responsible for recruitment, hiring, and training of professional staff. Provided training workshops in all aspects of environmental planning and cultural resource management for new planning staff. in the Office of Environmental Planning at Caltrans, District 4. 1997-2001

EXHIBIT H

Global Market Advisors

2017 Property Performance Estimate
Win-River Resort & Casino

Updated June 2019

Prepared for:
Paskenta Band of Nomlaki Indians

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I. EXECUTIVE SUMMARY

The Win-River Resort & Casino ("Win-River") in Redding, California, is owned and operated by the Redding Rancheria. Win-River has successfully carved out a position in the regional market by providing destination-style accommodations for the region's gamers as well as offering a convenient location to residents in and around Redding with a location on CA-273, six miles south of Redding.

To date, the Redding Rancheria has not made public Win-River's current operating performance.

The Paskenta Band of Nomlaki Indians ("Paskenta Band") owns and operates the Rolling Hills Casino Resort ("Rolling Hills"), located on Interstate 5 ("I-5") near Corning, CA. The Paskenta Band engaged Global Market Advisors ("GMA") to serve as an expert consultant to estimate the financial performance of Win-River in 2017. Specifically, GMA was asked to estimate how much gaming revenue the property generates from the local market, Win-River hotel guests, and highway travelers that stop at Win-River as they pass through Redding. With gaming revenues estimated for Win-River in 2017, GMA prepared a ProForma Income Statement for the facility down to the earnings before interest, taxes, depreciation, and amortization line ("EBITDA") that estimates how the facility may perform. GMA has no reason to doubt that the professional opinions provided in this Report are of continuing validity going forward into 2018, 2019, and 2020.

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SUMMARY OF FINDINGS

ESTIMATED WIN-RIVER 2017 GAMING REVENUE SUMMARY

GMA performed a gaming market assessment utilizing gravity model methodology to estimate the local market gaming revenue generated by Win-River in 2017. In 2017, GMA estimated that Win-River generated $72.0 million in gaming revenue excluding poker room revenue and bingo. Of this total, approximately $66.6 million is estimated to have stemmed from the local market and $5.4 million is estimated to have stemmed from the outer market (hotel guests and highway travelers that visit Win-River but do not reside in the local market area).



Estimated Win-River Gaming Revenue Summary 2017		
Demand Segment		**2017**
Local Market	$	66,607,780
Traffic Intercept	$	2,417,871
Hotel Database Guests	$	2,684,578
Hotel Latent Demand	$	298,182
TOTAL	**$**	**72,008,410**
Source: GMA		

ESTIMATED WIN-RIVER 2017 INCOME STATEMENT ANALYSIS

The following table summarizes the estimated revenues and expenses for Win-River in 2017. GMA estimated that Win-River generated $72.8 million in total gross gaming revenue including poker and bingo revenue. Additionally, $12.9 million in revenue was estimated to come from non-gaming sources including hotel, spa, food and beverage, entertainment, meetings and banquets, and retail and other sources. After deducting estimated free play and promotional allowances from gross revenue (which are estimated to be approximately $10.0 million), GMA estimated the facility produces $75.7 million in net revenue. With total property expenses estimated at $37.6 million, it is estimated that the facility generated approximately $38.1 million in EBITDA in 2017, achieving a 44.5 percent EBITDA margin on net revenue in that year.

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(Cont.)

Estimated Win-River Income Statement 2017		
		2017
Gaming Revenue	$	72,803,383
Gross Revenue	$	85,742,912
Net Revenue	$	75,694,145
Total Expenses	$	37,574,340
EBITDA	**$**	**38,119,805**
EBITDA Margin (Net)		44.5%
Source: GMA		

ESTIMATED CONTRIBUTION TO REDDING RANCHERIA

Based on the results of the aforementioned analysis, GMA estimated Win-River's likely contribution to the Redding Rancheria's enrolled Tribal Members as well as the Tribal Government in 2017. To perform this task, GMA relied on information available in the public domain that detailed the size of the enrolled Tribal Member population as well as the distribution of Win-River's EBITDA between both parties. According to the October 2017 Administrative Draft Environmental Impact Statement regarding the Redding Fee-to-Trust and Casino Project, section 3.7.2 states that the population of the Tribe includes 182 adult members and 156 minors.

Additionally, based on Redding Rancheria Ordinances, Resolution 98A, 98B and 98C, "The General Council finds that the general welfare of tribal members is best served, if 60% of the tribe's share of the net revenues of the gaming enterprise are provided in the form of per capita benefits to tribal members and 40% of the revenues are used for tribal programs that benefit the members collectively."[1] As a result, it is estimated that the Tribal Government received $15.2 million in distributions from Win-River in 2017, while the Tribal Members received a total of $22.9 million in distributions in that year.

On a per capita basis, this equates to approximately $67,668 in distributions per Tribal Member in 2017. (This does not include annual payouts to members at Christmas or other holidays or additional payments to tribal elders, which some tribes provide to their members.) The average annual household income for Shasta County in 2017 was $65,722. (See page 7.) Based on the Redding Rancheria Ordinances, Resolution 98A, 98B and 98C, it appears that per capita distributions are made equally to both tribal adults and minors, although most of the minors' payments are held in a trust until they hit a more mature age. As such, as Tribal member families typically have more than one tribal member, actual distributions per family are likely far greater than the per member distribution of $67,668. If it was assumed that the average family had 1.7 tribal members, that would push the average annual household income solely from tribal distributions to $115,035, which is 75% greater than the Shasta County average. It is safe to state that individual Redding Rancheria Tribal Members enjoy per capita distributions that are well above the average annual household incomes for the area.

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Estimated Per Capita Calculation
Redding Rancheria

	2017
Total EBITDA	$ 38,119,805
40% Allocation: Tribal Government	$ 15,247,922
60% Allocation: Tribal Members	$ 22,871,883
Estimated Share Per Tribal Member*	**$ 67,668**

Source: Redding Rancheria Fee-to-Trust and Casino Project Administrative Draft Environmental Impact Statement, GMA

** Assumes equal tribal distributions between adult and minor Tribal members*

[1] National Indian Law Library, Redding Rancheria Ordinances, Resolution 98A, 98B, 98C, Paragraph 5. https://narf.org/nill/codes/redding/redddistribution.html

II. ENGAGEMENT OVERVIEW

GMA utilized the following methodology in preparing the analysis and projections in this report.

METHODOLOGY

Utilizing gravity model methodology, GMA prepared a gaming market assessment to estimate gaming revenue for Win-River in 2017. GMA has a sufficient knowledge and understanding of casino resort performance throughout central and northern California, allowing GMA to accurately estimate current operating performance at facilities in the region.

REVIEW OF SECONDARY MARKET RESEARCH

GMA initiated this engagement with a review of secondary market research. Utilizing demographic mapping software, the Consulting Team examined demographic trends within the market and performed an evaluation of the market by age and income. GMA also examined the relevant competition in the region to understand the kinds of casinos and gaming products are available to the local population. With this information compiled, the Consulting Team gained an understanding of the trends within the market prior to the site visit.

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SITE VISIT

The Consulting Team conducted a two-day site visit to the market area, focusing on drive times between Redding, other core population centers, and competing facilities. The Consulting Team paid specific attention to the access and convenience of the Win-River facility from I-5. The Consulting Team spent one night at the Win-River Resort & Casino, examining business volume and the quality level of the casino, restaurants, and hotel. The Consulting Team also engaged employees in conversation to better understand business trends.

ANALYSIS

To forecast Win-River's total gaming revenue, GMA calculated gaming revenue derived from three main sources: the local day-trip market (gravity model methodology), Win-River hotel guests, and traffic intercept market (which accounts for highway travelers that stop at Win-River as they pass through Redding). With total gaming revenue quantified, GMA then estimated revenues derived from non-gaming revenue centers, property expenses, and EBITDA.

GAMING MARKET ASSESSMENT

GMA employed gravity model methodology to calculate gaming revenue derived from the local market population. The gravity model is a business forecasting model based on Newton's Universal Law of Gravitation. Newton's Law of Gravitation simply states that every particle in the universe attracts every other particle with a force that is directly proportional to the product of their masses and inversely proportional to the square of the distance between them. Newton's theory, which was first published in his 1687 work, "Mathematical Principles of Natural Philosophy," started to be adapted for commercial applications early in the 20th century.

Through a number of modifications, Newton's Law of Gravitation can be applied to the gaming industry. While a casino twice the size of another may not have twice the attraction, it does have some constant increased factor of attraction. In terms of distance, squaring the distance is not necessarily always the right figure. Typically, the power to which the distance is taken varies from a factor 1.5 to 2.5. The reason for this is that the actual distance between two objects will have a varying impact on different communities throughout the United States. This is primarily attributed to varying traffic patterns and geographical barriers between different communities, which results in significant changes in drive time. For example, for an individual living along the I-5 corridor in Northern California, traveling 100 miles to reach a business may not be perceived as a barrier as it would likely take less than 1.5 hours to reach. However, for someone living in the middle of Los Angeles, 100 miles could take up to three hours due to traffic congestion.

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(Cont.)

With local market gaming revenue quantified, GMA then estimated the amount of revenue derived from outer market segments, including gaming revenue from hotel guests and the traffic intercept market. The aforementioned analyses rely on well-established methodology that is accepted in the fields of gaming market analysis and economic forecasting.

PROFORMA INCOME STATEMENT ANALYSIS

With gaming revenues estimated for Win-River, GMA then prepared a ProForma Income Statement for the facility down to the EBITDA line by estimating non-gaming revenues and expenses generated by the property in 2017. GMA prepared the ProForma Income Statement Analysis by relying on its understanding of how other comparable casino-hotels in similar jurisdictions perform and the margins they achieve.

III. REGIONAL MARKET OVERVIEW

To gain a better understanding of the local and regional market area, GMA examined several relevant economic indicators including the region's demographics, employment, and tourism trends. GMA compiled and analyzed this information for the immediate local area of Shasta County and the counties of Siskiyou, Trinity, Tehama, Glenn, Butte, Colusa, Sutter, and Yuba.

DEMOGRAPHIC TRENDS

POPULATION

Shasta County's total population in 2017 was estimated at 179,984, and it is expected to grow at a compound annual growth rate ("CAGR") of 0.48 percent. Butte County, which contains the city of Chico, has the largest population among the nine counties listed, with a total of 227,155 residents. It is also one of the fastest growing counties in the region with a projected CAGR of 0.64 percent. Only Sutter County, which contains Yuba City, is projected to achieve a slightly higher growth rate at 0.65 percent. The following table details the regional population trend by county from 2017 to 2022.

T6-99
(Cont.)

Total Population			
	2017	2022	CAGR
Shasta County	**179,984**	**184,305**	**0.48%**
Tehama County	63,793	64,960	0.36%
Butte County	227,155	234,552	0.64%
Glenn County	28,460	29,085	0.44%
Siskiyou County	43,811	43,887	0.03%
Trinity County	13,113	12,954	-0.24%
Colusa County	21,918	22,530	0.55%
Sutter County	97,886	101,103	0.65%
Yuba County	75,798	78,916	0.81%
TOTAL	**751,918**	**772,292**	**0.54%**

Source: PCensus, GMA

The following table highlights the population of adults, age 21 or older. Overall, more than 75 percent of the region's collective population is over the age of 21. The region's adult population is also expected to grow at a CAGR of 0.66 percent, versus 0.54 percent for the total regional population. Shasta County's adult population is estimated at 141,661, representing 79 percent of the Shasta total population. Trinity County, located immediately to the west of Shasta County, boasts the highest percentage of adults at approximately 83 percent.

Adult Population (21+)			
	2017	2022	CAGR
Shasta County	**141,661**	**145,705**	**0.56%**
Tehama County	48,730	49,991	0.51%
Butte County	181,076	188,369	0.79%
Glenn County	20,992	21,645	0.61%
Siskiyou County	35,039	35,191	0.09%
Trinity County	10,889	10,735	-0.28%
Colusa County	15,856	16,453	0.74%
Sutter County	72,572	75,839	0.88%
Yuba County	54,723	57,075	0.85%
TOTAL	**581,538**	**601,003**	**0.66%**

Source: PCensus, GMA

AVERAGE ANNUAL HOUSEHOLD INCOME

The overall region has an average annual household income ("AAHI") of $65,336, and is expected to grow to $71,692 by 2022. Shasta County is expected to achieve the highest levels of growth in AAHI at an annual rate of 2.35 percent, outpacing the rate for the overall region by 25.5 percent. Sutter County is also expected to achieve substantial growth at a projected CAGR of 2.16 percent. Sutter County also enjoys the highest overall AAHI at $75,397, and it is projected to grow to $83,880 by 2022. The following table illustrates the estimated regional AAHI by county from 2017 to 2022.

T6-99
(Cont.)

Average Annual Household Income			
	2017	2022	CAGR
Shasta County	**$65,722**	**$73,825**	**2.35%**
Tehama County	$63,849	$70,811	2.09%
Butte County	$66,134	$72,316	1.80%
Glenn County	$61,118	$62,260	0.37%
Siskiyou County	$55,798	$60,169	1.52%
Trinity County	$58,922	$62,638	1.23%
Colusa County	$65,768	$67,219	0.44%
Sutter County	$75,397	$83,880	2.16%
Yuba County	$58,368	$62,615	1.41%
AVERAGE	**$65,336**	**$71,692**	**1.87%**

Source: PCensus, GMA

ECONOMIC TRENDS

EMPLOYMENT

GMA examined unemployment rates for Shasta County and several surrounding counties as well as the State of California as a whole to evaluate the region's relative economic strength. In 2017, Shasta County reported an average annual unemployment rate of 5.8 percent, down from 7.0 percent in 2016. Unemployment in Shasta County peaked in 2010 and 2011 with rates of more than 15 percent, and since then it has decreased annually at a rate of roughly 14 percent. While unemployment in Shasta County has markedly improved since the recession, it remains higher than the state average.

The following table lists annual unemployment rates from 2008 to 2017 for each county and the State of California. Each of the nine counties listed have reported higher unemployment levels than the state average in each of the past ten years.

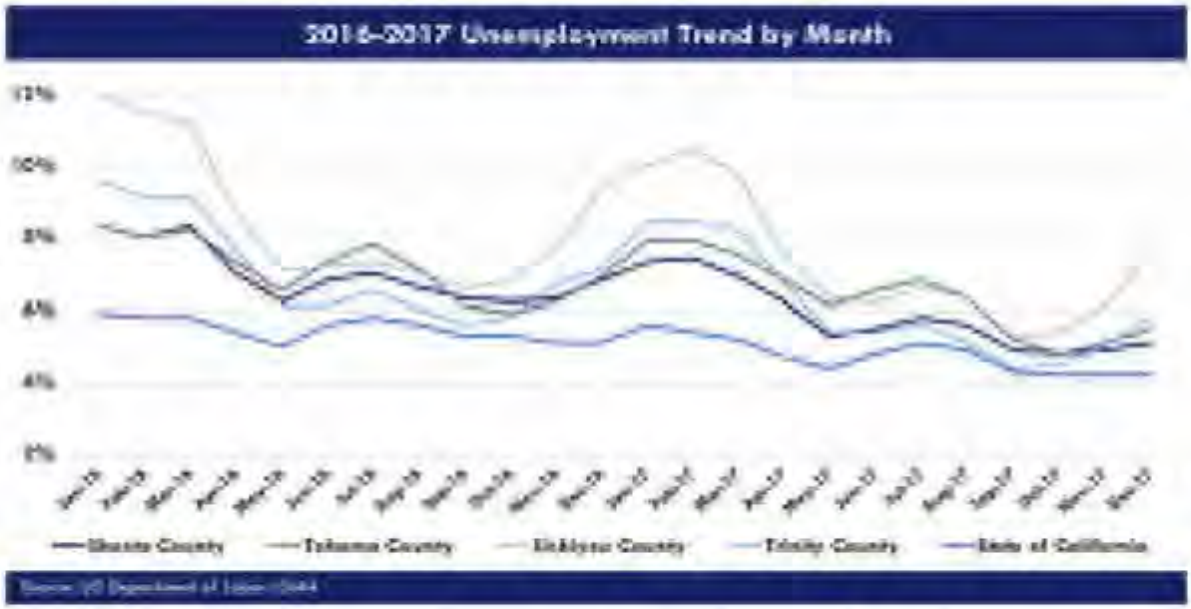
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10-Year Annual Unemployment Trend

	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Shasta County	**10.1%**	**14.3%**	**16.8%**	**15.9%**	**14.2%**	**11.8%**	**9.6%**	**7.8%**	**7.0%**	**5.8%**
Tehama County	9.2%	13.6%	15.4%	15.0%	13.7%	11.6%	9.6%	7.9%	7.1%	6.4%
Butte County	8.5%	12.3%	13.9%	13.7%	12.2%	10.3%	8.6%	7.2%	6.6%	5.7%
Glenn County	10.5%	14.1%	15.4%	15.5%	14.2%	12.1%	10.7%	8.7%	8.3%	7.5%
Siskiyou County	10.2%	14.2%	16.8%	17.0%	15.6%	13.1%	11.1%	9.4%	8.5%	7.2%
Trinity County	12.8%	16.8%	17.0%	16.7%	14.6%	11.9%	9.4%	7.8%	7.1%	6.0%
Colusa County	13.8%	17.6%	20.8%	21.2%	20.7%	18.9%	17.4%	15.4%	15.6%	14.3%
Sutter County	12.4%	16.5%	18.4%	18.2%	16.8%	14.6%	12.6%	10.7%	9.8%	8.6%
Yuba County	11.9%	16.8%	17.8%	17.0%	15.4%	13.2%	11.2%	9.3%	8.6%	7.4%
State of California	**7.3%**	**11.2%**	**12.2%**	**11.7%**	**10.4%**	**8.9%**	**7.5%**	**6.2%**	**5.5%**	**4.8%**

Source: US Department of Labor/GMA

GMA also compiled the trailing 24-month unemployment rates in order to understand recent and seasonal unemployment trends. In that period, unemployment rates in Shasta County have spiked in the summer and winter months, and then declined during the spring and fall. This trend is also present in the surrounding counties, as well as the State of California to a much lesser extent. The following chart illustrates the seasonality of unemployment in Shasta County and the adjacent counties of Tehama, Siskiyou, and Trinity, as well as the State of California over the past 24 months.



Focusing on Shasta County, unemployment rates for each month of 2017 have significantly improved compared to the prior year. In December 2017, unemployment was reported at 5.1 percent, representing a 25.0 percent improvement from December 2016. Additionally, unemployment in 2017 peaked at 7.4 percent in the month February, whereas the peak for 2016 was reported at 8.3 percent in both January and March. The following table demonstrates the improvement in unemployment rates in Shasta County, comparing monthly unemployment in 2016 and 2017.

T6-99
(Cont.)

Shasta County 24-Month Unemployment Trend

2016		2017		
Month	Rate	Month	Rate	% Change
Dec-16	6.8%	Dec-17	5.1%	-25.0%
Nov-16	6.3%	Nov-17	4.9%	-22.2%
Oct-16	6.2%	Oct-17	4.8%	-22.6%
Sep-16	6.3%	Sep-17	4.9%	-22.2%
Aug-16	6.6%	Aug-17	5.6%	-15.2%
Jul-16	7.0%	Jul-17	5.8%	-17.1%
Jun-16	6.8%	Jun-17	5.5%	-19.1%
May-16	6.2%	May-17	5.3%	-14.5%
Apr-16	7.0%	Apr-17	6.2%	-11.4%
Mar-16	8.3%	Mar-17	6.9%	-16.9%
Feb-16	8.0%	Feb-17	7.4%	-7.5%
Jan-16	8.3%	Jan-17	7.3%	-12.0%

Source: US Department of Labor/GMA

MAJOR EMPLOYERS & INDUSTRIES

The Win-River Resort & Casino is located in Redding, CA. With a population of approximately 90,000 people, Redding is California's largest city north of Sacramento and the county seat for Shasta County. As such, the city's largest employers are in the government, education, and healthcare industries. The largest employer in Redding is the Shasta County government, which accounts for roughly 2,000 employees. The Redding Rancheria is the sixth largest employer in the city, with Win-River accounting for a large share of the Tribe's 570 total employees. The following table lists the top ten largest employers in Redding, CA.

Major Employers in Redding, CA

Employer	# Employees	Industry
Shasta County	2,008	Government
Mercy Medical Center	1,566	Healthcare
Shasta Regional Medical Center	788	Healthcare
City of Redding	773	Government
CA Transportation Department	686	Government
Redding Rancheria*	570	Tribal Gov't
Shasta Union High School District	396	Education
Shasta Community College	369	Education
Shasta Community Health	350	Healthcare
Blue Shield of California	330	Healthcare

Source: City of Redding/GMA

** Note: Includes both tribal government and casino employees*

T6-99 (Cont.)

HOUSING VALUES

GMA also examined housing values over a ten-year period for the Redding metro area, as well as Sacramento, Yuba City, and Chico. By comparison, Redding has the lowest median home value among the four areas studied. The median home value for the Redding area in 2017 was $239,000, which was 7.4 percent lower than the Chico area, 35.2 percent lower than the Sacramento area, and less than half of the State of California. Since 2012, when housing values reached a 10-year low, the Redding metro area has also grown at an annual rate of 7.5 percent, which is the lowest of the four areas in that time. The median home value for the State of California has grown annually at just over ten percent since 2012, with Sacramento and Yuba City achieving even higher growth rates of 11.5 percent and 12.2 percent, respectively. The following chart illustrates the annual median housing value trend from 2008 to 2017 for the Redding, Sacramento, Yuba City, and Chico metro areas, as well as the average for the State of California.



TOURISM

The Redding area is a well-known outdoor recreation destination that offers a variety of activities including camping, hiking, boating, wildlife and scenic viewing, mountain sports, hunting, and fishing. A large portion of the tourism base is derived from the Sacramento region and San Francisco Bay area, which are approximately a three-hour drive from Redding. In the surrounding area of a Redding, there are two national parks that collectively draw over 1.3 million visitors annually. These parks are the Lassen Volcanic National Park and the Whiskeytown National Recreation Area. Following several years of consistent visitation growth, these parks saw visitation decrease by roughly 72,000 from 2016 to 2017, representing a 5.1 percent year-on-year decline. This is likely attributable to access road and trail closures as a result of fires and inclement weather.

T6-99
(Cont.)

Redding Area National Park Visitation

	2013	2014	2015	2016	2017
Lassen Volcanic N.P.	427,409	432,977	468,092	536,068	507,256
Whiskeytown N.R.A.	776,025	851,901	843,845	875,565	832,063
TOTAL	**1,203,434**	**1,284,878**	**1,311,937**	**1,411,633**	**1,339,319**

Source: National Park Service, U.S. Department of the Interior, GMA

In 2017, Lassen Volcanic National Park and Whiskeytown National Recreation Area combined for 170,584 total overnight stays, including stays through lodging and camping concessioners

authorized by the National Park Service, as well as other independent backcountry, RV, and tent campers. Over the past five years, overnight stays at these parks have fluctuated annually and have not experienced a consistent growth or decline trend. This is likely another result of fluctuating weather conditions causing occasional closures of trails, access roads, or even whole areas of the parks. The following table shows annual overnight visits at both of these national parks from 2013 to 2017.

Redding Area National Park Overnight Stays

	2013	2014	2015	2016	2017
Lassen Volcanic N.P					
Concessioner Lodging	5,119	5,904	6,209	6,182	5,575
Concessioner Campers	-	-	-	-	-
Tent Campers	54,435	56,334	73,794	59,742	56,772
RV Campers	25,620	27,054	28,422	27,633	29,730
Backcountry Campers	5,905	5,898	9,170	9,057	6,724
Miscellaneous	14,797	11,157	14,889	14,508	16,614
Sub-Total	**105,876**	**106,347**	**132,484**	**117,122**	**115,415**
Whiskeytown N.R.A.					
Concessioner Lodging	-	-	-	-	-
Concessioner Campers	16,814	25,364	16,660	29,490	21,752
Tent Campers	-	-	-	-	-
RV Campers	2,158	2,580	2,478	2,378	2,188
Backcountry Campers	992	5,470	5,539	5,583	4,669
Miscellaneous	29,970	26,948	27,636	28,631	26,560
Sub-Total	**49,934**	**60,362**	**52,313**	**66,082**	**55,169**
TOTAL	**155,810**	**166,709**	**184,797**	**183,204**	**170,584**

Source: National Park Service, U.S. Department of the Interior, GMA

T6-99
(Cont.)

IV. COMPETITIVE OVERVIEW

The greater Central Valley corridor along I-5 is currently served by a number of Native American casino properties. The following table summarizes key attributes of the primary competition for Win-River, including their gaming amenities, hotel rooms, and food & beverage outlets. Competitors are listed in this table and discussed below in order of their drive-time from Win-River, beginning with the nearest existing competitors.

Win-River Primary Competition Summary

Property Name	Slots	Tables Games	Poker Tables	Hotel Rooms	F&B Outlets
Rolling Hills Casino	840	8	-	111	4
Gold Country Casino & Hotel	900	14	-	87	4
Feather Falls Casino & Lodge	1,000	16	14	84	2
Colusa Casino Resort	1,200	6	2	55	4
Cache Creek Casino Resort	2,300	120	14	200	10
Thunder Valley Casino Resort	2,700	105	27	408	14
Red Hawk Casino	2,400	60	6	-	10
TOTAL	**11,340**	**329**	**63**	**945**	**48**

Source: Casino City, company websites, GMA

T6-99 (Cont.)

ROLLING HILLS CASINO

The Rolling Hills Casino is located in Corning, roughly 45 minutes south of Redding on I-5. It is the nearest primary competitor to Win-River. In addition to its 70,000-square foot gaming floor, the property includes two hotels, the Inn and the Lodge, which combine for a total of 96 standard rooms and 15 suites. The property also features an 18-hole golf course, an equestrian center, and an RV park.

PROPERTY SUMMARY

- 70,000-square foot gaming floor
  - 840 Class III slots
  - 8 Table games
- Four food & beverage outlets
  - Buffet
  - Timbers Steak house
  - Lounge
  - Aroma's Coffee House
- 111 total hotel rooms
  - The Inn – 51 standard rooms

  - The Lodge – 45 standard rooms and 15 suites
- Equestrian Center
  - Bleachers for 1,000 plus attendees
  - 300 covered stalls
  - 48 RV spaces – water and power hook-ups
- 18-hole golf course and clubhouse
- RV park and travel center

GOLD COUNTRY CASINO & HOTEL

Gold Country Casino & Hotel is located in Oroville, about 100 minutes south of Win-River. The longer drive time is largely a result of the property's access to major roads. The property is at least 40 miles off of I-5, depending on the route, and it is a ten-minute drive from the nearest freeway exit.

PROPERTY SUMMARY

- 60,000-square foot gaming floor
  - 900 slot machines
  - 14 table games
- 87-room hotel
- 15,000-square foot conference and meeting space
- 300-seat bingo hall
- Four restaurants
  - Steakhouse
  - Café
  - Buffet
  - Expresso Bar & Snack Bar
- Nearby 24-lane bowling center

T6-99
(Cont.)

FEATHER FALLS CASINO & LODGE

Feather Falls Casino is also located in Oroville, about five miles from Gold Country. While Feather Falls enjoys slightly easier access to the nearest freeway, its overall access is impeded by its distance from I-5.

PROPERTY SUMMARY

- 118,100-square foot gaming floor
  - 1,000 slots
  - 16 table games

  - Poker tournament room
  - 11,000-square foot non-smoking gaming room
- 84-room hotel
- Banquet room
- Two restaurants
  - Feather Falls Casino Brewing Co.
  - Dreamcatcher Buffet
- RV park

COLUSA CASINO RESORT

Colusa Casino Resort is located in Colusa, roughly 90 minutes south of Win-River and approximately ten minutes east of I-5.

PROPERTY SUMMARY

- 66,000-square foot gaming floor
  - 1,200 slots
  - 6 table games
  - 2 poker tables
- 55-room hotel
  - 3 suites
- Bingo Hall/Banquet Room/Show Room
- Four restaurants
  - Jack's Place
  - Seasons Buffet
  - Peet's Coffee
  - Snack Bar
- Salon/Spa
- Gift Shop

T6-99
(Cont.)

CACHE CREEK CASINO RESORT

Cache Creek Casino Resort is one of the oldest and most successful casino properties in California. It is located outside of the town of Brooks, roughly one hour west from Sacramento and 90 minutes north of Oakland. The property consists of a casino that houses 2,300 slot machines, 120 table games, a high-limit Asian table game room, high limit slot area, a 200-room hotel, a massive parking garage, and a mix of dining amenities that successfully serves diverse groups of

gaming customers, particularly Chinese gamers. The property's hotel operates with consistently high levels of occupancy, and its gaming revenue performance is among the best in California.

PROPERTY SUMMARY

- 94,000-square foot gaming floor
  - 2,300 slot machines
  - 120 table games
  - 14 poker tables
- 200-key hotel
  - 27 suites
  - 173 standard rooms
- Outdoor swimming pool
  - Cabanas
- Fitness center
- Spa
- 10 food and beverage venues
  - C2 Steak Seafood – Steakhouse
  - Chang Shou -Chinese and Pacific Rim
  - Asian Kitchen – Noodle room
  - Canyon Cafe – 24-hour, three meal room
  - Harvest Buffet
  - The Sports Page Pub & Grill
  - Three station food court
    - Loco Express – Mexican quick serve
    - The Deli
    - Sweets Etc. – 24-hour pastries and coffee counter
- Club 888 – a 600-seat showroom featuring headline acts and cover bands
- An outdoor amphitheater in the south parking lot was recently dismantled to allow for construction of the hotel expansion.
- Surface parking to the south and north sides of the property and a five-level, 1,883-space garage with high speed ramps running in the center of the structure.
  - VIP parking on first level
- Yocha Dehe Golf Club
  - 18-hole championship course
  - Clubhouse
  - Bahtenta Grill

T6-99
(Cont.)

- Bar and lounge
- Convenience store and gas station

Cache Creek is currently undergoing a $200 million expansion, including a hotel expansion that is expected to be complete in December 2018. The full expansion project includes the following:

- 459-key hotel (in addition to the existing 200 rooms)
- New outdoor pool
- Restaurant
- Conference and meeting space
- Multi-purpose ballroom

THUNDER VALLEY CASINO RESORT

The Thunder Valley Casino Resort opened in 2003 and is owned and operated by the United Auburn Indian Community. The property is a roughly 40-minute drive north from downtown Sacramento. Thunder Valley recently added 111 hotel rooms to its existing 297-room hotel, bringing the total room count to 408, and the Tribe is moving forward with $56 million in improvements, which are discussed below in further detail.

T6-99
(Cont.)

PROPERTY SUMMARY

- 144,500-square foot gaming floor
  - 2,700 electronic gaming devices
  - 105 table games
  - 27 poker tables
  - High limit table game room
  - High limit slot area
- 14 food & beverage outlets
  - Red Lantern (upscale Asian)
  - High Steaks Steakhouse
  - The Buffet
  - Thunder Café
  - Five-station food court
    - Fatburger
    - Peet's Coffee
    - Panda Express
    - Subway
    - Pizza Hut Express

  - Thunder Bar
  - Illusions Bar
  - The Mirage Bar
  - Poolside bar and restaurant
  - Main stage entertainment lounge
- 408-key hotel
- Spa
- Fitness Center
- Outdoor pool area
- 13,000-square foot of convention and meeting space
- Outdoor amphitheater
- Valet parking
- Garage parking
- Surface parking

Thunder Valley's $56 million upgrade includes an expansion of its current gaming floor, a new smoke-free poker room and bingo hall, and a new high-limit slot area. The resort is expected to have 3,400 slot machines by mid-year 2018. The resort is also upgrading its luxury suites, the largest of which comprises 2,100 square feet.

T6-99
(Cont.)

RED HAWK CASINO

The Red Hawk Casino is owned and operated by the Shingle Springs Band of Miwok Indians. It is a 50-minute drive east of downtown Sacramento on US-50.

The property has struggled despite its proximity to downtown Sacramento and the dense population in the southeast Sacramento valley. This is due in large part to high infrastructure development costs, including the expense of building ramps and access roads from US-50. The property also lacks a hotel and is somewhat removed from residential areas. Nevertheless, the casino property succeeds in attracting its share of the Sacramento population.

PROPERTY SUMMARY

- 88,000-square foot gaming floor
  - 2,400 electronic gaming devices
  - 60 table games
  - 6 poker tables
  - High limit table game room
  - High limit slot area

- 10 food & beverage outlets
  - Henry's Steakhouse
  - Hawk's Tavern
  - Pearl Asian Cuisine
  - Pearl Asian Express
  - Koto Grill (Mexican)
  - The Burger Spot
  - Waterfall Buffet
  - Hawk's Snacks
  - Stage Bar
  - High Limit Bar
- Kidsquest
- Cyberquest Arcade
- Gift Shop
- Valet parking
- Garage parking

T6-99
(Cont.)

V. GAMING MARKET ASSESSMENT

The first step in performing the gaming market assessment was to divide the greater market area into several market segments. GMA carved the regional market based on variations in the demographic composition of the various communities, access to the subject facility as well as competing facilities, and the availability of other (non-gaming) entertainment activities.

GRAVITY MODEL MARKET SEGMENTS

Within the gravity model, the greater market area was divided into nine distinct market segments, each of which was then further broken down to the zip code level to allow for increased levels of granularity in the analysis. This allowed the model to distribute gaming visits from each zip code to each casino included in the competitive set. For the purposes of this analysis, GMA divided the primary market into two segments, allowing for the Consulting Team to adjust the facility's attraction of markets on the west and east of I-5. As I-5 serves as a major thoroughfare in the region, GMA divided the remainder of the market into secondary and tertiary segments based on their access to I-5 and the facility.

T6-99
(Cont.)

The map on the following page illustrates the nine market segments used in this analysis and the location of each gaming facility by type in the region. The map is followed by a brief discussion of the demographic composition of each individual market segment. For each market segment, total population, adult (age 21 and over) population, and AAHI were quantified.

2017 GREATER MARKET CARVE MAP



T6-99
(Cont.)

DEMOGRAPHIC SUMMARY

TOTAL AND ADULT POPULATIONS

In 2017, the regional market was home to an estimated 818,328 million residents. Low population growth rates are expected in the region to reach 839,204 residents in 2022. The Tertiary Southeast market segment comprises over 42 percent of the total population in the region, followed by the combined Primary segment (Redding) at nearly 22 percent, and the Secondary South segment (Corning) at about 20 percent.

When examining the region by age, there were an estimated 602,695 residents age 21 or older, or 74 percent of the total population. This segment of the regional population is expected to reach 623,170 adult residents in 2022. The following tables detail the total and adult populations for the defined regional market by market segment. For the purposes of this analysis, GMA quantified population data for 2017 and the subject year of 2022.

Total Population

	2017	2022	CAGR
Primary West	79,618	81,075	0.36%
Primary East	98,105	100,807	0.54%
North	12,102	12,034	-0.11%
South	46,923	47,854	0.39%
East	9,350	9,185	-0.36%
Secondary North	27,074	27,139	0.05%
Secondary South	159,366	164,699	0.66%
Tertiary South	40,468	41,311	0.41%
Tertiary Southeast	345,322	355,100	0.56%
TOTAL	**818,328**	**839,204**	**0.51%**

Source: GMA, PCensus

Adult Population (Age 21+)

	2017	2022	CAGR
Primary West	59,853	61,165	0.43%
Primary East	73,793	76,221	0.65%
North	9,908	9,916	0.02%
South	34,760	35,757	0.57%
East	7,386	7,262	-0.34%
Secondary North	20,109	20,125	0.02%
Secondary South	115,185	121,038	1.00%
Tertiary South	28,274	29,140	0.61%
Tertiary Southeast	253,427	262,546	0.71%
TOTAL	**602,695**	**623,170**	**0.67%**

Source: GMA, PCensus

T6-99 (Cont.)

INCOME

The average annual household income is relatively similar when comparing each market segment, except for Secondary North ($54,293). Overall, AAHI in the region in 2017 was estimated at $66,455 and is expected to reach $72,886 in 2022. The Primary West and Primary East market segments are poised to grow the fastest at average annual growth rates of 2.17 percent and 2.42 percent, respectively. The most populated market segment of Tertiary Southeast is expected to grow at a strong pace of 1.75 percent annually. Additionally, the Secondary South market segment is also expected to grow at a rate of 1.85 percent annually, reaching AAHI of $75,519 in 2022. The following table details AAHI by market segment.

Average Annual Household Income			
	2017	2022	CAGR
Primary West	$63,445	$70,650	2.17%
Primary East	$67,719	$76,315	2.42%
North	$62,382	$67,968	1.73%
South	$65,546	$72,433	2.02%
East	$68,095	$73,917	1.65%
Secondary North	$54,283	$58,666	1.57%
Secondary South	$68,907	$75,519	1.85%
Tertiary South	$70,224	$73,092	0.80%
Tertiary Southeast	$66,466	$72,484	1.75%
AVERAGE	**$66,455**	**$72,886**	**1.86%**
Source: GMA, PCensus			

GAMING FACTORS & OVERALL MARKET SIZE

Gaming factors consist of Propensity and Average Annual Win. For the purposes of this assessment, GMA added an additional category to reflect the percentage of gamer visits that will accrue to casinos that were not included in the defined local market. This allowed the model to account for those visits lost to other jurisdictions such as Las Vegas and Reno, and allowed the model's gaming factors to be calibrated to the actual behaviors of regional gaming patrons. The multiplication of these gaming factors by a market's adult population and its AAHI determined the gross levels of gaming revenue generated by the subject market.

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PROPENSITY

Propensity represents the percent of the adult population (defined as people age 21 and over) that will visit a casino at least once in a given year. Propensity factors experience large ranges throughout the United States. At the high-end of the scale is the local Las Vegas market in which almost 70 percent of adults gamble. In rural sections of the country with few gaming options, this factor can be as low as 17 percent. In greater Redding and surrounding areas, moderately high gaming factors are experienced, ranging from approximately 37 to 42 percent, as this population has had exposure to gaming facilities for quite some time.

AVERAGE ANNUAL WIN

Average Annual Win ("Average Win") represents the amount of money a gamer in a market will lose on average to a casino over a twelve-month period. This factor is generally dependent on a player's average household income and distance that he/she must travel to reach a casino. Average Win is based on a percentage of a player's AAHI.

Average Win as a percent of gamers annual income figures experienced in the greater Redding market area are estimated to be moderate compared to other gaming markets around the country. Percent income figures in the market area range from 1.8 percent to 2.2 percent compared to other gaming markets where this figure ranges between 1.1 percent and 2.6 percent.

Gaming factors in the United States have remained fairly constant over the past few years and generally only change with the addition of new casinos. However, the onset of the recession has had an estimated negative one or two percentage point impact on these figures. In estimating gaming factors, GMA utilized gaming propensities published in Harrah's Survey of the American Gambler and proprietary research data gathered by GMA as well as other sources.

GAMING REVENUE ESTIMATES

The following section discusses the results of the gaming market assessment.

2017 ESTIMATE MODEL

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To estimate the amount of gaming revenue generated at Win-River in 2017, GMA first estimated gaming revenues generated by each of the facilities in the greater region. Since gaming revenues in the region are not publicly disclosed, GMA relied on its extensive experience in the region as well as its understanding of the performance levels achieved by casinos operating in similar jurisdictions to accurately calibrate the model to 2017 conditions. In performing this analysis, GMA researched which casino properties were operating in the region in 2017. It is important to note that Rain Rock Casino did not open until February 2018 and was therefore excluded from this analysis.

This analysis yielded the estimated gaming revenue generated by the local market at Win-River in 2017. In 2017, GMA estimates that Win-River generated $66.6 million in local market gaming revenue. Of this total, it is estimated that 35.6 percent and 44.2 percent stemmed from the Primary West and Primary East market segments, respectively. Additionally, GMA estimates that approximately $5.4 million in gaming revenue was generated by the outer market segment in that year. In total, it is estimated that the facility generated total gaming revenue of $72.0 million in 2017 (excluding poker and bingo revenue). The following table summarizes the results of this analysis in greater detail.

Estimated Market Gaming Factors and Win-River Gaming Revenue 2017

	Propensity	% Revenue to Casinos in Model	% Income as Annual Win	Win-River	Market Gaming Revenue
Primary West	39.0%	95%	2.00%	$ 23,694,445	$ 28,141,992
Primary East	39.0%	95%	2.00%	$ 29,435,020	$ 37,108,315
North	37.0%	95%	1.80%	$ 1,229,896	$ 3,921,311
South	40.0%	95%	2.05%	$ 6,974,391	$ 17,787,006
East	37.0%	93%	1.80%	$ 276,944	$ 3,077,651
Secondary North	38.0%	95%	1.90%	$ 1,684,796	$ 7,511,337
Secondary South	41.5%	95%	2.16%	$ 2,900,029	$ 67,291,567
Tertiary South	39.0%	95%	2.00%	$ 46,819	$ 14,691,307
Tertiary Southeast	38.0%	94%	1.90%	$ 365,441	$ 114,116,492
SubTotal				**$ 66,607,780**	**$ 293,646,979**
Outer Market				$ 5,400,631	
TOTAL				**$ 72,008,410**	

Source: GMA

OUTER MARKET ANALYSES

GMA performed a series of individual analyses to assess the value of the outer market segment. In performing these analyses, GMA relied on several assumptions which were based on metrics achieved by comparable casino hotel properties operating in similar jurisdictions. The following sections detail the methodology utilized in these analyses.

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HOTEL GUEST MARKET

To project the amount of gaming revenue derived from hotel guests staying at the facility, GMA first estimated the amount of rated/tracked gaming revenue at the facility in 2017 as well as the distribution of that gaming revenue by tier group. This allowed GMA to quantify the size of the database in terms of players and visits by tier group. The Consulting Team then made certain assumptions regarding the frequency of hotel visits by tier to estimate the total casino database room nights of demand ("RND") generated at the facility. With accommodated casino RND quantified, GMA then applied appropriate spend per RND metrics to each player database tier, including the amount of expected companion spend contributions. This analysis yielded that the casino likely garnered approximately $2.7 million in gaming revenue from its casino database hotel guests.

In addition to the casino database hotel guests, the latent hotel guests also contributed to gaming revenue in that year. As GMA estimated the likely performance of the facility's hotel in the subject year, as well as the amount of RND generated by the casino segment, the remaining RND is expected to stem from the latent demand segment. Latent demand is derived from hotel

guests that seek overnight accommodation, but have a primary purpose for staying at the hotel that is not gambling. Nevertheless, a portion of these latent demand guests are expected to gamble during their stay. GMA applied appropriate capture rates and spend per RND figures for each latent demand segment. As a result, GMA estimated that latent demand hotel guests contributed $0.3 million in gaming revenue to the facility in 2017.

TRAFFIC INTERCEPT MARKET

GMA estimated the amount of gaming revenue derived from the traffic intercept market based on its experience and understanding of how other comparable casinos in similar markets attract patrons from this market segment. In performing this portion of the analysis, GMA assessed the facility's proximity to major roadways and thoroughfares and evaluated the size and flow of traffic volumes on neighboring roadways. As a result, GMA estimated that this segment contributed $2.4 million in gaming revenue to the property in 2017.

GAMING REVENUE SUMMARY

The following table summarizes total gaming revenue by demand segment. The local market accounts for approximately 92.5 percent of total gaming revenue (excluding poker and bingo revenue). In aggregate, traffic intercept and gaming revenue derived from hotels guests accounts for 7.5 percent of total gaming revenue or $5.4 million.

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Estimated Win-River Gaming Revenue Summary 2017

Demand Segment		2017
Local Market	$	66,607,780
Traffic Intercept	$	2,417,871
Hotel Database Guests	$	2,684,578
Hotel Latent Demand	$	298,182
TOTAL	**$**	**72,008,410**

Source: GMA

GAMING PERFORMANCE SUMMARY

With total gaming revenue estimated for 2017, GMA made certain assumptions for how much gaming revenue was generated by slot machines and table games. These assumptions were based on GMA's understanding of the distribution of gaming revenue achieved at comparable properties in the region. Then, these assumptions were adjusted based on GMA's understanding of how the facility's gaming revenue distribution may differ due to the market's unique characteristics and the facility's amenity offerings.

With this distribution quantified, GMA was able to examine win per unit metrics and assess how these metrics compare to casino-hotels similar to Win-River. Assuming an average of 650 slot machines were operational in 2017, it is estimated that Win-River generated a win per slot of $279 and win per table of $1,315 (assuming 12 tables). Additionally, as the facility featured bingo and poker amenities in 2017, GMA estimated the amount of revenue generated by these departments. In total, it is estimated that Win-River generated $72.7 million in gross gaming revenue in 2017. The following table illustrates this analysis in greater detail.

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Estimated Win-River Gaming Performance Summary 2017		2017
# Slots		650
WPS		$279
Slot Revenue	$	66,247,738
# Tables		12
WPT		$1,315
Table Revenue	$	5,760,673
# Poker Tables		5
WPTT		$363
Poker Revenue	$	662,477
Total Gaming Revenue	**$**	**72,670,888**

Source: GMA

VI. PROFORMA INCOME STATEMENT ANALYSIS

With gaming revenues estimated, GMA prepared a ProForma Income Statement down to the EBITDA line, estimating all property revenues and expenses generated by Win-River in 2017. GMA prepared the Income Statement Analysis by relying on its understanding of how other casino hotels in similar jurisdictions perform and the margins they achieve.

REVENUES

Gaming: As estimated in the Gaming Market Assessment chapter of this report. Poker room revenue and bingo were estimated on a margin basis.

Food & Beverage: Estimated on a margin basis of gross gaming revenue consistent with comparable casino hotels operating in similar jurisdictions. GMA also evaluated the food & beverage outlets at Win-River noting quality levels and pricing to estimate average cover by outlet to serve as a secondary check of this analysis.

Hotel: Estimated based on occupancy and ADR performance metrics consistent with other hotel performance metrics achieved in the region, assuming 84 operational keys.

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Hotel Other and Spa: Estimated based on relevant spend per RND metrics and capture rates.

Entertainment Venue: Based on estimated annual shows and relevant occupancy and average ticket price performance metrics.

Meetings & Banquets: Based on estimated latent group RND and relevant spend per group RND.

Retail & Other: The Retail & Other category is comprised of revenues generated by other ancillary amenities at each facility. GMA estimated Retail & Other revenue as a percentage of gross gaming revenue.

FREE PLAY AND PROMOTIONAL ALLOWANCES

Free play was estimated as a percentage of gross slot revenue. In estimating free play, GMA assumed a higher rate relative to regional competitors based on Win-River's location and access to major roadways. GMA estimated Promotional Allowances by calculating the amount of hotel revenues, F&B revenues and other revenues that would be given to customers on a complimentary basis. These comps were estimated based on industry metrics as a percent of revenue compared by venue.

EXPENSES

Departmental expenses were estimated on a margin basis. Departmental expense margins were adjusted based on GMA's knowledge of expense margins experienced at similarly sized gaming facilities in relevant markets. GMA estimated gaming tax according to the state gaming compact as a percentage of gross slot revenue.

Estimated Win-River Income Statement

	2017
REVENUES	
Slots	$ 66,247,738
Tables	$ 5,760,673
Poker	$ 662,477
Bingo	$ 132,495
GAMING REVENUE	**$ 72,803,383**
Food and Beverage	$ 8,736,406
Hotel Rooms	$ 2,169,898
Hotel Other	$ 138,666
Spa	$ 104,000
Entertainment Venue	$ 412,500
Meetings & Banquets	$ 104,000
Retail & Other	$ 1,274,059
GROSS REVENUE	**$ 85,742,912**
Free Play	$ 5,631,058
Promotional Allowances	$ 4,417,709
NET REVENUE	**$ 75,694,145**
EXPENSES	
Slots	$ 5,299,819
Tables	$ 2,999,294
Poker	$ 563,106
Gaming Tax	$ 2,649,910
Bingo	$ 125,871
Cage and Count	$ 1,528,871
Food and Beverage	$ 8,299,586
Hotel	$ 807,997
Entertainment Venue	$ 577,500
Meetings & Banquets	$ 67,600
Retail & Other	$ 764,436
G&A	$ 3,429,716
Marketing	$ 5,573,289
Maintenance and Engineering	$ 3,172,488
Security	$ 1,714,858
TOTAL EXPENSES	**$ 37,574,340**
EBITDA	**$ 38,119,805**
EBITDA Margin (Gross)	44.5%

Source: GMA

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VII. APPENDICES

FIRM QUALIFICATIONS

Global Market Advisors, LLC provides clients with market feasibility studies, primary research, economic impact studies, due diligence, payroll control, operations analysis, business and marketing plan development, and player reward program design for the gaming, hospitality and tourism industries. The principals and associates of GMA have hands-on experience in nearly all aspects of the gaming industry including domestic and international operations, project development, marketing expertise, and detailed market analysis.

Global Market Advisors is a (Nevada) Limited Liability Corporation with offices in Las Vegas, NV, Denver, CO, Taipei, Taiwan and Bangkok, Thailand. Below is the contact information for the company's partners.

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BIOGRAPHIES OF THE CONSULTING TEAM

STEVEN M. GALLAWAY

Steve Gallaway is Managing Partner at Global Market Advisors. His areas of expertise include gaming market assessments, hotel and casino feasibility studies, operational reviews and marketing analysis.

Mr. Gallaway has spent his entire career in the gaming and hospitality industry, starting as a valet attendant and eventually rising to chief operating officer and managing partner of a casino in Colorado. Prior to forming GMA, he served as senior vice president of a hospitality consulting firm where he honed his craft in the fields of gaming market assessments and feasibility analysis. During the span of his career, Steve developed hands-on experience in operations management,

EXHIBIT I

REDDING RANCHERIA ALTERNATIVE SITE DESCRIPTION

I. GENERAL INFORMATION

A. Address: 7764 South Highway 273, Anderson, CA 96007
B. Assessor ID: 049-390-037
C. Acres: 63.89
D. Site Description: The subject property, owned by the United States in trust, is vacant and has a point of access from Clear Creek Road. The site is approximately 1,041.7 feet North of Redding Rancheria Road.

Map 1: Alternative Site – United States Trust Lands (Blue-Shaded)

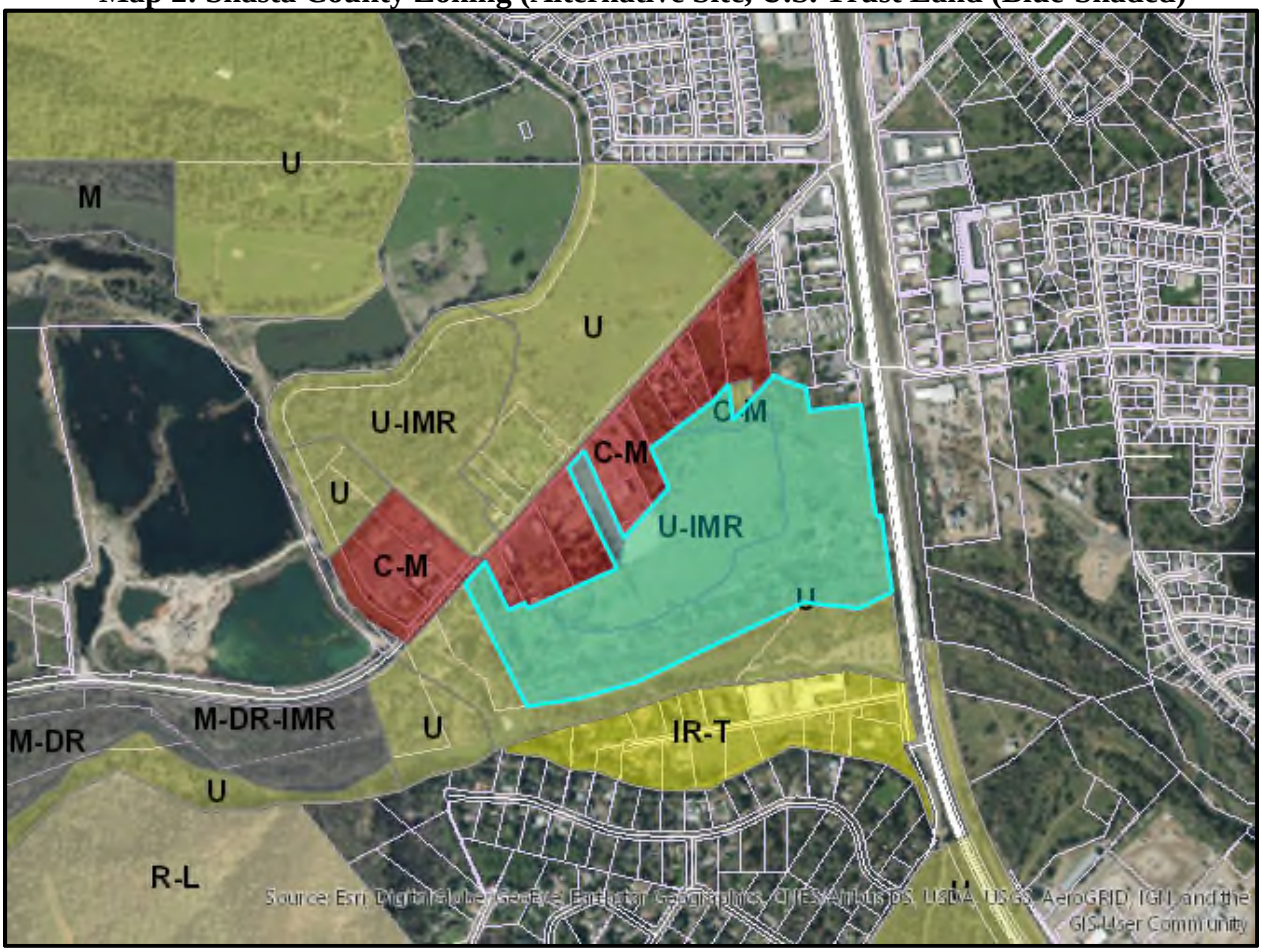


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II. ADJACENT LAND USES AND ZONING

The site is located in the Unclassified Interim Mineral Resource (U-IMR) Zoning District of Shasta County. Permitted uses in this area include residential, agricultural and timber management and mixed uses. Adjacent zoning districts are the Commercial Light Industrial (C-M) and Interim Rural Residential (I-R) Zoning Districts.

Map 2: Shasta County Zoning (Alternative Site, U.S. Trust Land (Blue-Shaded)



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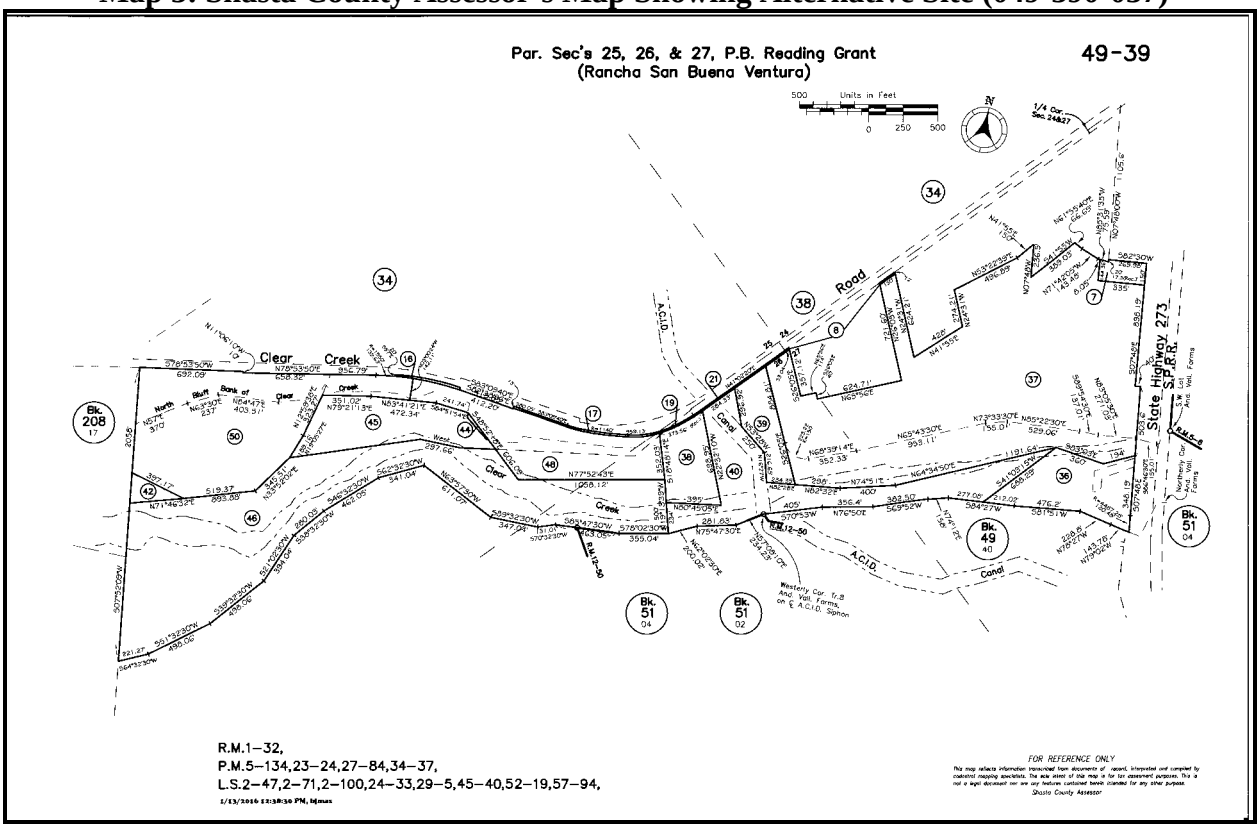
III. OWNERSHIP STATUS

A. Current Owner: United States of America Trust

B. Sale History:

Sale 1	**Sale 2**	**Sale 3**
10/31/1995	**12/29/2009**	**03/21/2019**
Grant Deed	Grant Deed - $4 Million	N/A
	Seller – McConnell Foundation	Transfer to U.S.

Map 3: Shasta County Assessor's Map Showing Alternative Site (049-390-037)



Sources:

Parcel Quest – https://pqweb.parcelquest.com/

Shasta County Assessor-Recorder - https://www.co.shasta.ca.us/index/assessor_index/assessment_inquiry.aspx

Shasta County Map Viewer - http://gis.co.shasta.ca.us/scmap

Shasta County Zoning Code - https://library.municode.com/ca/shasta_county/codes/code_of_ordinances?nodeId=CD_ORD_TIT17ZO_CH17.64UNUDI_17.64.020PEUS

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EXHIBIT J



Global Market Advisors

Economic Return Evaluation of the Redding Rancheria Draft Environmental Impact Statement Alternatives: Review of Methodology, Reasonableness of Conclusions, and Analysis of a Modified "Alternative F"

May 2019

Prepared for:
Paskenta Band of Nomlaki Indians

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I. EXECUTIVE SUMMARY

On April 10, 2019, the Bureau of Indian Affairs ("BIA") published a Notice of Availability, advising the public that as lead agency, the BIA intends to file a Draft Environmental Impact Statement ("Draft EIS") with the U.S. Environmental Protection Agency in connection with the Redding Rancheria's application requesting that the United States acquire approximately 232 acres of land in trust in Shasta County, CA ("Strawberry Fields Site") for the construction and operation of a casino resort, immediately south of the City of Redding. The Draft EIS has put forth a total of four different alternative development scopes at the Strawberry Fields Site and two additional alternative development scopes at other locations. The scope of each development alternative is summarized in the following table.

Redding Rancheria Draft EIS Alternative Development Scenarios Summary

	Alternative A	Alternative B	Alternative C	Alternative D*	Alternative E	Alternative F**
Site	Strawberry Fields	Strawberry Fields	Strawberry Fields	Strawberry Fields	Anderson	Current Win-River Site
Alternative Name	Proposed Project	Proposed Project - No Retail	Reduced Intensity	Non-Gaming	Anderson	Expansion of Existing Casino
Total Square Feet	1,123,273	993,273	1,102,042	234,656	1,087,973	756,071
EGDs	1,200	1,200	825	N/A	1,200	250
Tables	36	36	21	N/A	30	0
F&B	6 venues	6 venues	6 venues	3 venues	6 venues	No Change
Hotel Keys	250	250	250	128	250	No Change
Parking Spaces	2,250	2,250	2,250	200	2,250	1,710
MICE Square Feet	10,080	10,080	10,080	N/A	10,080	Converting MICE to casino use, new 10,000 sq. ft. space
Event Center Seats	1,800	1,800	1,800	N/A	1,800	

Source: Redding Rancheria Draft EIS, GMA

**For Alternative D, the existing Win-River Resort & Casino would continue to operate under current conditions*

***Incremental to the current Win-River Resort & Casino today*

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The Paskenta Band of Nomlaki Indians ("Paskenta Band") owns and operates the Rolling Hills Casino Resort ("Rolling Hills Casino"), located on Interstate 5 ("I-5") near Corning, CA, approximately 46 miles south of the Strawberry Fields Site and the Win-River Resort & Casino, owned by Redding Rancheria. The Paskenta Band asked Global Market Advisors ("GMA") to perform an evaluation of (i) whether Alternative F in the Draft EIS was reasonable from the perspective of economic return to Redding Rancheria; (ii) whether any alternative to Alternative F should have been presented and reviewed and if so, what that alternative would be comprised of, (iii) the incremental gross revenue projections prepared and presented by Pro Forma Advisors LLC ("PFA") within the Draft EIS for each Alternative; (iv) whether these gross revenue projections alone are a reasonable way to assess economic return to Redding Rancheria and what the proper methodology would be to assess economic return to Redding Rancheria; and (v) using proper

methodology and alternatives, what the preferred alternative would be from the perspective of assessing economic return to Redding Rancheria.

GMA provides clients with gaming market assessments, market feasibility studies, primary research, due diligence, payroll control, operations analysis, business and marketing plans, and player reward program design. GMA has worked in gaming markets across the U.S. and has a thorough understanding of the Northern/Central California gaming market, in particular. Dating back to 2007, GMA has conducted market studies for nineteen California tribes including the Enterprise Rancheria, Wilton Rancheria, Cahto Tribe of the Laytonville Rancheria, Scotts Valley Band of Pomo Indians, Coyote Valley Band of Pomo Indians, Table Mountain Rancheria, Sherwood Valley Rancheria and the Tachi Yokut Nation. Beyond California, GMA has completed assignments for approximately 75 Indian tribes across the United States. As such, GMA is well positioned and prepared to provide the following unbiased, third-party analysis of the regional market.

SUMMARY OF FINDINGS

GMA's summary findings are that: (i) Alternative F in the Draft EIS was an illogical expansion suggestion that was not reasonable from the perspective of economic return to Redding Rancheria; (ii) there was a much more attractive alternative to Alternative F that should have been presented and reviewed (as described herein, the "Modified Alternative F"; (iii) the incremental gross revenue projections prepared and presented by Pro Forma Advisors LLC ("PFA") within the Draft EIS overstated expected incremental gross revenues for Alternative A; (iv) measuring incremental gross revenue projections is neither a reasonable nor a proper way to assess economic return to Redding Rancheria as it does not consider the payments for financing the development costs, assessment of operating costs and therefore illustrating the additional cash flow available to Redding Rancheria; and (v) using proper methodology and alternatives, that the Modified Alternative F is clearly preferable from the perspective of assessing economic return to Redding Rancheria to any other Alternative.

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For its conclusions on economic return to Redding Rancheria, the Draft EIS relies entirely on the incremental revenue projections prepared and presented by PFA for Alternatives A, B, C, and F. Specifically, the Redding Rancheria Strawberry Fields EIS Economic Analysis report ("PFA Report"), which presents PFA's findings, appears in Volume II, Appendix A of the Draft EIS. The PFA Report projected the potential performance of a Redding Rancheria project under the six different alternative development scenarios and illustrated projected incremental gross revenues by major department, estimated economic impacts tied to each alternative, as well as project development costs for each alternative (summarized in the following table).

Pro Forma Advisors - Redding Rancheria Draft EIS Projections						
In USD millions	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Casino GGR*	$34.7	$34.7	$24.6	-	$27.9	$2.9
Hotel*	$5.6	$5.6	$4.7	$1.8	$5.1	-
Retail*	$46.9	-	$46.9	$42.7	$42.7	-
F&B and Other*	$4.9	$4.9	$4.0	$2.9	$4.3	$1.6
TOTAL REVENUE*	**$92.1**	**$45.2**	**$80.2**	**$47.4**	**$80.0**	**$4.5**
Casino-Hotel Development Cost	$165.9	$165.9	$147.8	$35.9	$190.9	$43.3
Retail Development Cost	$32.5	-	$32.5	$30.0	$30.0	-
TOTAL DEVELOPMENT COST	**$198.4**	**$165.9**	**$180.3**	**$65.9**	**$220.9**	**$43.3**
Total Economic Impact	$352.8	$272.1	$323.4	$128.7	$375.2	$63.9
Direct Economic Impact	*$225.8*	*$173.3*	*$207.4*	*$83.5*	*$240.7*	*$40.5*

Source: Pro Forma Advisors LLC **Incremental*

The PFA Report only addressed incremental gross revenues. Analytically, the reliance on projected incremental revenue to determine the feasibility of a project is flawed and is not the proper way to assess economic return to Redding Rancheria. This approach fails to address financing costs, operating and ongoing maintenance and capital expenses for the Alternatives and thus does not include an estimate of return on investment or actual projected cash flow available to Redding Rancheria for each Alternative.

The flaws in this approach are compounded by the fact that Alternative F as set forth in the Draft EIS makes no economic sense, and that the Draft EIS fails to describe a potential development scenario on the existing site that would provide a positive economic return to Redding Rancheria.

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In 2022, GMA's incremental gaming revenue projections were lower when compared to PFA's Strawberry Fields alternative projections (A, B, and C), although much higher for Alternative F based on GMA's Modified Alternative F as described within this document. Under GMA's Modified Alternative F, Redding Rancheria could realize an incremental $13.0 million in casino gross gaming revenue ("GGR"). The Draft EIS Alternative F incremental gaming revenue projections are low because the components that comprise Alternative F would not result in a significant amount of increased gaming revenue and do not make any economic sense. The potential performance of an improved and expanded Win-River Resort & Casino at its current location under GMA's Modified Alternative F would generate a healthy amount of incremental revenue and would be economically viable.

Comparison of Incremental Gaming Revenue Projections				
	Alt A	Alt B	Alt C	Alt F
GMA*	$ 31,198,576	$ 30,661,475	$ 24,210,186	$ 12,991,136
PFA	$ 34,700,000	$ 34,700,000	$ 24,600,000	$ 2,900,000

Source: GMA, Pro Forma Advisors LLC
**For Alternative F, projections are shown for GMA's Modified Alternative F*

Incremental gaming revenues are of course only a first step in assessing the full picture of economic return. A project with high gross revenues but low cash flow (whether due to high development costs, high operating expenses or both) obviously is neither preferable nor superior to a project with somewhat lower gross revenue but higher cash flow (whether due to lover development costs, lower operating expenses or both).

Thus, to address this properly, with the incremental gaming revenue projections complete, GMA prepared a proforma income statement analysis to project earnings before interest, taxes, depreciation, and amortization ("EBITDA") for each development alternative. GMA utilized the 2017 EBITDA estimate prepared by GMA in the June 2018 study titled "Expert Consultation: 2017 Property Performance Estimate – Win-River Resort & Casino" to understand how each alternative could incrementally benefit Redding Rancheria from a true and complete economic return analysis.

EBITDA is compared to project development costs to estimate a project's economic feasibility and return. Typically, in the gaming industry, developments are not feasible when the multiple of EBTIDA to development cost is greater than 7.5. EBITDA multiple in this case is simply the total project cost divided by the projected EBITDA in the subject year. It is an important and widely used valuation metric across the casino industry used to evaluate the feasibility of a project because it approximates how many years of EBITDA would be required to pay off the project cost. Given development cost expectations in each alternative, the Strawberry Fields Site alternatives are expected to generate multiples of EBITDA to development cost between 9.9 and 10.3, making Alternatives A, B, and C economically unfeasible. A lower EBITDA multiple is favorable because it means that a project cost can be paid off faster allowing for earnings to directly benefit the developer (here the Redding Rancheria) sooner. A higher EBITDA multiple means that more cash flow will be tied up over a longer period of time to pay off the project cost.

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At the same time, Alternative F as defined in the Draft EIS makes no economic sense because it involves irrational buildouts. GMA's Modified Alternative F presents a feasible and superior development scenario with an EBITDA multiple of 6.3, which would be highly financeable and provide additional net income to the Redding Rancheria while carrying only a minimal amount of risk. This would be highly financeable as the total project cost ($43.3 million) is less than a 1 multiple of total facility EBITDA (2018 estimated EBITDA of $39.4 million + an incremental $6.9 million = $46.3 million.)

To further illustrate the complete picture of economic return, GMA prepared the following table to illustrate the net benefit to Redding Rancheria. GMA took into account interest expense assuming debt service of the total amount borrowed and additional maintenance expenses that would be associated with financing these types of projects. These incremental expenses need to be deducted from incremental EBITDA generated to yield net operating income ("NOI") due to

the proposed development. For purposes of this document, and based on current financial market conditions, GMA assumed that should Redding Rancheria be successful in raising money for the Strawberry Fields site that the interest rate would approximate 10%.[1] A lower interest rate was assumed for Alternative F at 6.5% due to it being an expansion and renovation of an existing property with stabilized EBITDA. It is likely that this rate could be as low as 5.5%, depending on how much existing debt is on the property today. Expansions and renovations on existing properties are underwritten as less risky relative to brownfield or greenfield developments, which a Strawberry Fields development would be considered.

When considering these additional expenses, NOI will be negative under Alternatives A, B, and C. On the other hand, the Modified Alternative F could provide an incremental positive NOI of $3.7 million to Redding Rancheria.

Projected Impact of Alternative Development Scenarios on Redding Rancheria Performance

	Win-River 2022 Base Projections	SB Fields 2022 Alternative A	SB Fields 2022 Alternative B	SB Fields 2022 Alternative C	Win-River 2022 Alt F / Mod. Alt F
PFA Total Incremental Revenue (Draft EIS)		$ 92,100,000	$ 45,200,000	$ 80,200,000	$ 4,500,000
GMA Total Incremental Revenue (vs. '17)*	$ 2,879,534	$ 91,520,839	$ 43,473,764	$ 83,375,459	$ 17,155,174
GMA Projected EBITDA*	$ 39,404,872	$ 59,351,718	$ 55,999,464	$ 56,856,213	$ 46,326,193
Incremental EBITDA (vs. '22)*	$ -	**$ 19,946,846**	**$ 16,594,592**	**$ 17,451,341**	**$ 6,921,321**
Project Cost (From PFA except Alt F)**		$ 198,400,000	$ 165,900,000	$ 180,300,000	$ 43,320,216
Multiple of Incremental EBITDA*		**9.9**	**10.0**	**10.3**	**6.3**
Multiple of TOTAL EBTIDA*		**3.3**	**3.0**	**3.2**	**0.9**
Net Operating Income Analysis					
Assumed Interest Rate		10.0%	10.0%	10.0%	6.5%
Interest Payment*		$ 19,840,000	$ 16,590,000	$ 18,030,000	$ 2,815,814
Incremental Maintenace Capex*		$ 1,830,417	$ 1,086,844	$ 2,084,386	$ 428,879
Incremental Net Operating Income**		**$ (1,723,571)**	**$ (1,082,252)**	**$ (2,663,045)**	**$ 3,676,628**

Source: GMA, Pro Forma Advisors LLC

**asterisk indicates projections shown utilizing GMA's Modified Alternative F*

***Net Operating Income = EBITDA less Interest Payment and Maintenance Capex*

Redding Rancheria will achieve a higher return on investment by expanding and repositioning the existing property for $43 million under the Modified Alternative F, as detailed within this document, than it would by spending $165 to $198 million on a new property at Strawberry Fields. GMA's Modified Alternative F is a clearly superior alternative to Alternatives A, B & C when considering the economic return to Redding Rancheria.

[1] For purposes of this analysis, this rate was applied against the total project costs as it is unknown if the Redding Rancheria intends to utilize their own equity (which would have an opportunity cost associated with it). In addition, as stated in the text, it is unknown if financing costs, contingency and other soft costs are included in the estimated project costs for Alternatives A, B and C. For GMA's modified Alternative F, a contingency and soft cost are included. Financing costs would likely be minimal as financing could likely be through a conventional bank loan.

T6-100 (Cont.)

II. METHODOLOGY AND ASSUMPTIONS

METHODOLOGY

GMA utilized the following methodology in completing this report.

REVIEW OF PRIMARY AND SECONDARY MARKET RESEARCH

GMA initiated this engagement with a review of primary and secondary market research. This included an examination of demographic data for the region and pertinent information publicly available in the Redding Rancheria Fee-to-Trust and Casino Project Draft EIS. Additionally, GMA analyzed economic trends within the region including wage, employment trends, and housing values.

SITE VISIT

GMA conducted a four-day site visit to the market area. During the site visit, GMA visited each of the primary casino competitors in the region, taking note of each facility's gaming and non-gaming amenities, attractiveness, access, and proximity to local population centers. GMA also revisited the existing Win-River Resort & Casino in Redding to understand its relative attractiveness and amenities as well as how the Redding Rancheria operates their existing casino-hotel property today. In addition, GMA conducted a thorough evaluation of the Strawberry Fields site and its surrounding areas. This was critical to understand each site's ease of access from the regional highway network, proximity to population centers, and the types of commercial and residential development around the site.

T6-100
(Cont.)

ANALYSIS

GAMING MARKET ASSESSMENT

To understand the gaming revenue potential for each evaluated alternative, GMA developed a series of gravity models. The gravity model is a business forecasting model based on Newton's Universal Law of Gravitation. Newton's Law of Gravitation simply states that every particle in the universe attracts every other particle with a force that is directly proportional to the product of their masses and inversely proportional to the square of the distance between them. Newton's theory, which was first published in his 1687 work, "Mathematical Principles of Natural Philosophy" started to be adapted for commercial applications early in the 20th century.

Through a number of modifications, Newton's Law of Gravitation can be applied to the gaming industry. While a casino twice the size of another may not have twice the attraction of another, it does have some constant increased factor of attraction. In terms of distance, squaring the distance is not necessarily always the right figure. Typically, the power to which the distance is taken varies from a factor 1.5 to 2.5. The reason for this is that the actual distance between two

objects will have a varying impact on different communities throughout the United States. This is primarily attributed to varying traffic patterns and geographical barriers between different communities, which results in significant changes in drive time. For example, for an individual living in rural Nevada, traveling 100 miles to reach a business may not be perceived as a barrier as it would likely take less than 1 ½ hours to reach. However, for someone living in the middle of Los Angeles, 100 miles could take up to three hours due to traffic congestion.

By researching and estimating gaming revenue levels at each of the gaming properties within the competitive set, researching the number of gaming positions provided within each, visiting each casino property to understand their relative aesthetic attractiveness (including a consideration of non-gaming amenities), and utilizing gaming factors from proprietary and public sources, the model was calibrated to current market conditions.

Once calibrated, GMA grew the model to the subject year of 2022. This served as the Base Projections Scenario ("Base Scenario"). The Base Scenario factored in expected changes in gaming supply (e.g. assumed expansions of gaming facilities in the regional trade area), anticipated demographic growth/decline, and that none of the Draft EIS alternatives would occur. GMA made a best-effort to align its base scenario market assumptions with the assumptions utilized by PFA in the Draft EIS. Additionally, as a part of this scenario, GMA assumed that the current renovations and expansions underway at the Rolling Hills Casino would be completed prior to the subject year.

T6-100
(Cont.)

In each projected alternative scenario, GMA layered in each assumed Draft EIS development scope to forecast potential gaming revenue for each Strawberry Fields alternative (Alternatives A, B, and C). To forecast gaming revenue potential for Alternative F, GMA created an additional scenario utilizing its best-use expert recommendation for development which was different from the Draft EIS development scope for Alternative F. Utilizing the gravity model results, GMA was in a position to compare its gaming revenue projections to the projections presented in the Draft EIS.

PROFORMA INCOME STATEMENT ANALYSIS

With gaming revenues quantified for each alternative, GMA prepared incremental non-gaming revenue projections for each alternative. In some cases, GMA assumed the incremental non-gaming revenue projections provided in the PFA Report. Subsequently, GMA completed a ProForma Income Statement down to the EBITDA line for each alternative. For this portion of the analysis, GMA relied on the analysis it performed within its June 2018 study titled "Expert Consultation: 2017 Property Performance Estimate – Win-River Resort & Casino." The analysis completed in that study included assumed levels of historical operational margins at the existing facility. GMA appropriately adjusted these margins to account for the unique development assumptions in each scenario.

MAJOR ASSUMPTIONS

MARKET CHANGES

GMA prepared its forecasts for the assumed a stabilized year of 2022. This subject year was utilized in order to be consistent with the stabilized year assumed by PFA in the Draft EIS. GMA notes that PFA assumed the Strawberry Fields alternatives would open in 2020, making 2022 the first year of stabilized operations. This assumed timeframe is clearly impossible to achieve as the beginning of 2020 is only six months away from the date of the completion of this report. As such, GMA strongly suggests that the Revised January 2018 PFA Report would be updated with a more realistic development timeframe that will allow for more accurate projections for each alternative.

GMA assumed the following major changes would occur in the regional market:

- Enterprise Rancheria will open an integrated casino resort in Wheatland, CA that will be branded as the Hard Rock Hotel Casino at Fire Mountain. This assumption is consistent with the PFA Report as detailed on page 29 of the PFA Report.
- Wilton Rancheria opens a casino resort in Elk Grove. This assumption is not clear in the PFA report. However, the PFA Report states, "There are a number of other casinos that are within the larger market area and are included in the gravity model analysis, but not listed below. Examples would include the new or under construction facilities such as Fire Mountain and Rain Rock casinos as well as other existing casinos that fall within the 'other' competitive market category." Therefore, it is possible that this market entrant was assumed in the PFA gravity series.
- The Mechoopda Tribe does not open a casino near Chico during the forecasting period. This assumption is also not clearly detailed within the PFA Report.

T6-100
(Cont.)

ROLLING HILLS IMPROVEMENTS

The following improvements will be made to the Rolling Hills Casino and will be fully operational by 2022:

- The 59 lodging keys at the Lodge will be fully renovated.
- The Inn will receive a modest renovation.
- The gaming floor will be expanded with an additional 150 class III electronic gaming devices ("EGDs") and four table games.
- The food & beverage program at Rolling Hills will incorporate the following improvements:
  - Expanded Timbers Steakhouse and Aromas Café.

- The existing buffet's seating capacity will be reduced to 180 seats.
- New brew pub restaurant and beer garden.
- New Fatburger quick serve dining outlet.
- New casino center bar.

- The current meeting space will be renovated and expanded with capacity for 1,000 in a ballroom configuration (10,000 sq. ft.).
- A natural outdoor amphitheater will be built near the north end of the casino.

GMA notes that it is unclear from a review of the PFA Report if the PFA gravity series accounted for any of the above assumptions regarding changes to the Rolling Hills Casino.

REDDING RANCHERIA STRAWBERRY FIELDS PROJECT – ALTERNATIVES A, B, & C

Redding Rancheria builds, owns, and operates a new casino resort at the Strawberry Fields Site adjacent to I-5, south of Redding as defined in the Executive Summary. GMA prepared projections for the development scopes as detailed under Alternative A, B, and C.

GMA ASSUMED ALTERNATIVE F DEVELOPMENT SCOPE

GMA was asked to review Alternative F, as presented in the Draft Environmental Impact Statement. Alternative F consists of an expansion of the existing Win-River Resort & Casino, utilizing an area that currently houses an events center/bingo hall. Additionally, this scenario assumes that a new 10,000 square foot events center would be built in the parking lot on the south side of Redding Rancheria Road. In addition, a separate 1,710 space parking garage would be constructed proximate to, but not appurtenant to the events center or the casino.

T6-100
(Cont.)

GMA performed an evaluation to define the attributes of a Modified Alternative F that would optimize economic benefit to the Redding Rancheria. Those attributes for the best use of the current facility site are described in detail in Chapter III. They include:

- Renovation of the existing casino floor.
- A major retrofitting of the existing air handling system in the casino in order to provide a quality indoor environment that is free of stale cigarette smoke.
- Demolition of the existing events center building to be replaced by a new two story structure. This new building would house the following amenities:
  - Two additional dining outlets including a brew pub and upscale dining outlet on the main level.
  - 6,000 square feet of gaming space, capable of accommodating 200 additional electronic gaming devices on the main level.
  - A dedicated 1,000-seat entertainment venue on the second level.
  - Seamless connectivity to the existing casino.

- A 1,000-space parking garage with a covered overhead walkway connecting to the casino, proximate to the porte cochere.
- No additional lodging capacity.

PROJECT DESCRIPTIONS

The Redding Rancheria provided six alternatives for development of the Project, including four alternatives for the Strawberry Fields site, one for the Anderson site, and one for the existing Win-River Resort & Casino. Alternative A, the Proposed Project at the Strawberry Fields site, would consist of full-scale casino resort development. The 1.1-million square foot development would feature a casino with 1,200 electronic gaming devices ("EGDs") and 36 table games, along with a 9-story hotel tower offering 225 standard rooms and 25 suites. The project would also feature a variety of food & beverage outlets including a 225-seat buffet, a café, a sports bar and grill, a bakery/deli counter, a 125-seat food court, and specialty restaurants. Additionally, the project would include 130,000 sq. ft. of big-box/regional retail space, which would primarily be geared toward outdoor/sporting goods. Other proposed amenities include 10,080 sq. ft. of conference and meeting space, a 1,800-seat event center, a 1,500-seat outdoor amphitheater, an outdoor pool, spa, fitness center, a winter garden, and 2,250 total parking spaces including both garage and surface parking.

T6-100 (Cont.)

Alternative B would feature the exact same set of amenities as Alternative A, except for the 130,000 sq. ft. of retail space. Alternative C, the reduced-intensity development, would feature many similar elements of Alternatives A, although gaming amenities would be reduced to 825 EGDs and 21 tables, and other non-gaming amenities would be slightly reduced in size. Alternative D, the non-gaming alternative, would feature significantly reduced non-gaming amenities, and it would not include a casino. The main attraction of Alternative D would be regional retail space that is similar in size and scope to that of Alternative A. The Anderson development, or Alternative E, would be largely similar to Alternative A but with slightly reduced gaming amenities. Alternative F would include an expansion of the existing Win-River Resort & Casino, including the addition of 250 EGDs and a new, 10,000 sq. ft. events center. The existing events center at Win-River would be converted to gaming space to accommodate the additional EGDs.

The table on the following page summarizes the proposed gaming and non-gaming amenities and the development characteristics for each development scenario (Alternatives A – F).

Strawberry Fields Site Development Alternatives						
	Alternative A Proposed Project	**Alternative B Proposed Project – No Retail**	**Alternative C Reduced Intensity**	**Alternative D[*] Non-Gaming**	**Alternative E Anderson**	**Alternative F Expansion of Existing Casino**
Total Sq. Ft.	1,123,273	993,273	1,102,042	234,656	1,087,973	756,071
Gaming	1,200 EGDs 36 tables Poker room	1,200 EGDs 36 tables Poker room	825 EGDs 21 tables	N/A	1,200 EGDs 30 tables Poker room	Add 250 EGDs
F&B (# Seats)	Buffet (225) Café (100) Specialty restaurants (66) Bakery/deli counter (15) Food court (125) Sport bar & grill (124)	Buffet (225) Café (100) Specialty restaurants (66) Bakery/deli counter (15) Food court (125) Sport bar & grill (124)	Buffet (200) Café (100) Specialty restaurants (66) Bakery/deli counter (15) Food court (125) Sport bar & grill (124)	Steakhouse (66) Sports bar & grill (99) Café/deli counter (100)	Buffet (225) Café (100) Specialty restaurants (66) Bakery/deli counter (15) Food court (125) Sport bar & grill (124)	No change
Hotel	9-story hotel 225 standard rooms, 25 suites	9-story hotel 225 standard rooms, 25 suites	9-story hotel 225 standard rooms, 25 suites	9-story hotel 128 rooms	250 rooms	No change
MICE	10,080 sq. ft. conference center, 1,800-seat event center	10,080 sq. ft. conference center, 1,800-seat event center	10,080 sq. ft. conference center, 1,800-seat event center	N/A	10,080 sq. ft. conference center, 1,800-seat event center	New 10,000 sq. ft. event center (old event center to be converted for casino use)
Parking	2,250 total spaces 1,650 garage, 600 surface	2,250 total spaces 1,650 garage, 600 surface	2,250 total spaces 1,650 garage, 600 surface	200 surface parking spaces	2,250 total spaces 1,650 garage, 600 surface	Add seven-story, 1,710-space parking garage
Other Amenities	130,000 sq. ft. regional retail, 1,500-seat outdoor amphitheater, one retail shop within the casino, outdoor pool, spa, fitness center, winter garden	1,500-seat outdoor amphitheater, one retail shop within the casino, outdoor pool, spa, fitness center, winter garden	130,000 sq. ft. regional retail, 1,500-seat outdoor amphitheater, one retail shop within the casino, outdoor pool, spa, fitness center, winter garden	120,000 sq. ft. regional retail, one retail shop within the hotel, outdoor pool, spa, fitness center	120,000 sq. ft. regional retail, one retail shop within the casino, outdoor pool, spa, fitness center	No change
Jobs (Construction)	1,372	1,114	1,295	497	1,537	280
Jobs (Permanent)[**]	650	319	558	346	554	45
Development Cost ($mm)	$198.4	$165.9	$180.3	$65.9	$220.9	$43.3
Total Economic Impact ($mm)	$352.8	$272.1	$323.4	$128.7	$375.2	$63.9

Source: Redding Rancheria Draft EIS; GMA *[*] For Alternative D, the existing Win-River Resort & Casino would continue to operate under current conditions* *[**] Permanent jobs only show direct new employment attributable to the respective project*

Comment Letter T6 - Exhibit J

T6-100 (Cont.)

III. EVALUATION OF WIN-RIVER AND ALTERNATIVE F

STATEMENT OF PURPOSE

As part of its engagement, GMA was asked to review Alternative F, as presented in the Draft Environmental Impact Statement. As presented in the Draft EIS, Alternative F consists of an expansion of the existing Win-River Resort & Casino, utilizing an area that currently houses an events center/bingo hall. A new 10,000 square foot events center would be built in the parking lot on the south side of Redding Rancheria Road. In addition, a separate 1,710-space parking garage would be constructed proximate to, but not appurtenant to the events center or the casino in this alternative scenario.

In preparing this review, Andrew Klebanow, Senior Partner at GMA conducted a two-day site visit to Redding and the Win-River Resort & Casino. The site visit included an overnight stay in the hotel, meals in each food & beverage outlet, and an evaluation of all public areas. In addition, the Consultant drove to the Rolling Hills Casino in Corning and the Pit River Casino in Burney to better understand drive time, road conditions and the levels of attraction of those properties.

Mr. Klebanow is very familiar with the Northern California gaming market and the subject property. He has worked as a consultant to tribal casinos since 2001. He has authored 118 articles in casino gaming publications including 92 articles in Indian Gaming Magazine. His most recent article, appearing in the May 2019 issue, focused on casino restaurant strategies. During his career, Mr. Klebanow has evaluated 977 individual casino properties across the globe and on average, evaluates over 80 casinos a year. In his role as a casino feasibility consultant, Mr. Klebanow is often asked to provide facility planning recommendations for tribes exploring property expansions or property replacements. Mr. Klebanow applied the same methodology used in those studies to this evaluation.

T6-100
(Cont.)

EVALUATION OF EXISTING WIN-RIVER RESORT & CASINO

EXTERIOR OF THE PROPERTY

ARRIVAL EXPERIENCE

Patrons enter/egress the Win-River Resort & Casino from CA-273, a north-south thoroughfare that runs parallel to Interstate 5 and serves as a primary route into central Redding. The casino-hotel is accessed via Redding Rancheria Road, which runs along the length of the property. The property's amenities are laid out in a linear fashion with Redding Rancheria Rood running south of the hotel, casino, events center and RV Park. The road terminates in a cul-de-sac, bordering reservation housing.

Access to the property is good, with a large pylon sign standing at CA-273. CA-273 is a divided four lane highway. A traffic signal controls traffic into and out of the property. Redding Rancheria Road curves south, leading to casino surface parking on the left and hotel surface parking to the right.

A porte cochère provides access to both the hotel and casino along with valet parking services. The porte cochère is attractive, provides a good sense of arrival, is well laid out and provides four lanes of traffic for vehicles to queue.

Porte cochère and Win-River Hotel



T6-100
(Cont.)

SURFACE PARKING LOT

A surface parking lot on the west side of the hotel serves hotel guests and a larger surface parking lot borders the southern side of Redding Rancheria Rd. Access to casino from the parking areas is good although it is evident that parking capacity may be insufficient during concerts and special events.

CREEKSIDE WALKING PATH

A nature trail runs along the north side of the casino property at a lower grade from the hotel, offering hotel guests an attractive recreation area. The trail provides exercise areas, ostensibly for both residents living on the reservation and guests of the hotel. In addition, an outdoor promenade borders the north side of the casino-hotel structure, offering guests the ability to dine or sit outside.

CASINO

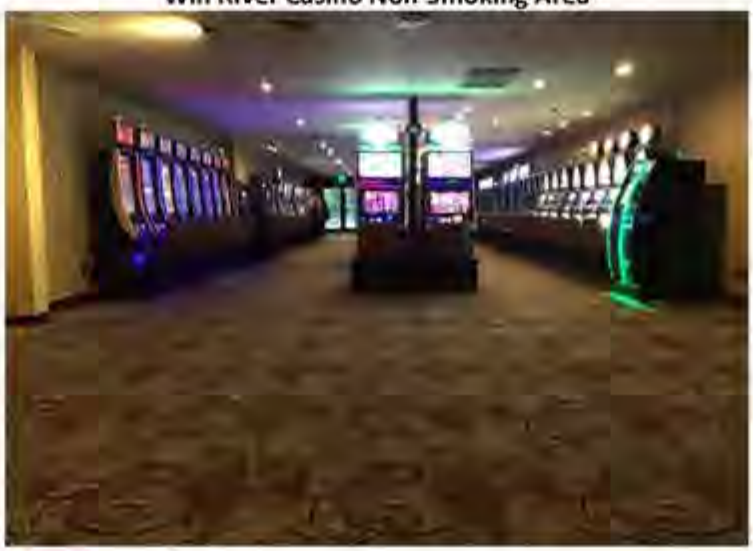
The casino is accessed from both the porte cochère and entrances that face the parking lot. Access is excellent as patrons need only walk a short distance from the parking lot to reach the casino.

The casino is rectangular in shape and is well-laid out. A circular counter near the entrance closest to the hotel serves as a player rewards center. A gift shop sits just north of the hotel entrance. A table game pit runs down the center of the casino and is flanked with banks of slot machines on either side. Two dining facilities, a sit-down restaurant and quick-serve outlet, sit on the north side of the casino and share a common kitchen area. A casino bar and entertainment lounge flank the south side of the casino. Beyond the main casino are glass doors that separate the casino from a non-smoking area, poker room and events center/bingo hall.

Air quality in the main casino is poor, with a fairly strong smell of cigarette smoke during both busy and slow periods. Poor air quality is a major hindrance to non-smoking patrons, particularly in California where the incidence of smoking is lower than in other states. While the property offers a separate non-smoking area with approximately 90 machines, the non-smoking area is not an attractive area. Ceilings in this area are low and the space doubles as a queuing area for the events center. Pipes containing data cables run down from the ceiling to machine banks, indicating that the space was repurposed as a gaming area.

T6-100
(Cont.)

Win River Casino Non-Smoking Area



An attractive six-table poker room is accessible from the non-smoking slot area. It too offers a non-smoking gaming environment and appears appropriately sized to the needs of the market.

BINGO HALL/EVENTS CENTER

A multi-purpose room adjacent to the non-smoking area serves as both an events center and bingo hall. It is housed in a building that appears to have been repurposed into an events center, perhaps from a Class II bingo hall. Unlike the main casino and hotel, this building appears to have employed less expensive construction techniques, such as steel exterior walls.

Exterior of Win-River Events Center



T6-100
(Cont.)

A permanent raised stage and presidium sits on the north side of the room and light and sound equipment hang from the ceiling. Second floor offices were also visible along the southern wall. According to the EIS, seating for events is 1,000. The room converts to a bingo hall when concerts are not scheduled. Overall, the room does not provide either an attractive place for a concert or a comfortable place to play bingo.

FOOD & BEVERAGE

ELEMENTS

Elements is the property's primary restaurant, offering lunch and dinner service. Tables are arranged around a large, oval bar and the room provides attractive views of the adjacent woods and creek. Food quality was good but does not offer anything more than a basic dining experience. While adequate for guests of the casino, this restaurant does not have sufficient appeal to attract people to the property who would visit primarily for a dining experience. It does not have the marketing appeal of nationally branded chains such as Chili's or TGIF. Its primary purpose is to serve patrons of the casino and hotel.

Elements does not fulfill the marketing promise that is made on the casino's website or on in-room collateral material, which depict high-end steaks and lobster among other items. It is not a fine dining room or even an upscale casual dining concept. It is a place for casino customers to get something to eat.

CREEKSIDE PUB AND GRILL

The Creekside Pub and Grill is a combination quick-serve dining outlet and bar. The primary grill area is open to the dining area and bar. The open kitchen concept is nothing more than a grill and steamtables facing the dining area. A glass partition separates the cooking area from diners but the area is cluttered with bags of bread and other items. Menu offerings are comprised of standard grilled foods, which are adequate but, like Elements, is not appealing enough to attract people to the property. It too serves the role of feeding people who are already on property to gamble.

The dining area is open to the casino and cigarette smoke drifts into this space. The bar area, although reasonably attractive, is incompatible to the quick-serve dining area. It just is not a particularly comfortable space to sit and have a drink.

Creekside Bar and Kitchen Area



T6-100
(Cont.)

OVERTIME CASINO BAR AND LOUNGE

The Overtime Casino Bar and Lounge is located on the opposite side of the casino floor. The bar contains bar top gaming devices as well as a walk-up area where patrons can purchase drinks to take into the casino. On the east side of the bar is a lounge area that provides approximately 150 seats and a small dance area. This area is adequate to support local cover bands and casino events.

SUMMARY OF FOOD & BEVERAGE

All of the property's existing food & beverage outlets are adequate to meet the needs of gaming patrons and hotel guests. Nevertheless, they do not provide sufficient marketing appeal to attract people from the community whose primary purpose of visitation is to eat or be entertained. They also are not appealing to higher-worth gamers that would like more upscale dining environments to enhance their gaming experiences.

HOTEL

LOBBY

The Win River hotel lobby is attractive and provides comfortable seating, along with computer stations. The entire hotel wing is non-smoking. Service levels at the hotel were excellent.

Win-River Hotel Lobby



T6-100
(Cont.)

SPA, FITNESS CENTER, POOL AND ARCADE

The spa is located adjacent to the hotel lobby. It is an attractive area and matches the hotel's AAA three-diamond designation. The outdoor pool and jacuzzi area are also attractive. This amenity sits above the creek, providing a comfortable resort setting. The fitness center and arcade are both small but adequate.

Win-River Pool and Spa Area



HOTEL ROOMS

Standard rooms are better than a three-star grade accommodation. Sized at approximately 450 sq. ft., they offer upscale case goods, granite countertops throughout, a large desk and bedside tables, and a three-fixture bath. The hotel rooms' primary drawback are its HVAC units. Rooms are equipped with portable terminal air conditioning (PTAC) units. PTAC units are normally installed in limited service properties. These are noisy whenever the thermostat activates the unit. PTAC units detract from what would otherwise be comfortable rooms.

T6-100
(Cont.)

SUMMARY OF HOTEL

Overall, the Win-River Hotel provides a comfortable overnight lodging experience. The rooms are competitive with the Sheraton Hotel Redding, a recently built property located near I-5 and superior to those available at the Rolling Hills Casino & Hotel. Nevertheless, given the current lackluster dining options, the hotel's marketing appeal remains limited.

ALTERNATIVE F PROPOSED IMPROVEMENTS

GMA reviewed the proposed site plan presented in Alternative F. It depicts a dedicated events center situated in the south parking lot. It also shows a 1,710-space parking garage, also located in the south parking lot. While a new parking garage and events center are certainly needed, the proposed location/design of these amenities defies the fundamental rules of sound casino design. Neither amenity is connected to the casino. Patrons attending a concert can walk directly from the events center to the parking garage without setting foot into the casino. Sound casino design calls for driving patrons from the garage through the casino and then to the events center and then forces customers to return to their cars taking the same path. This kind of design

passively induces a portion of patrons to visit the casino and avail themselves of the various gaming and dining options. This is a fundamental design flaw with Alternative F and if built as currently planned, will not benefit the casino or its restaurants.



T6-100 (Cont.)

Alternative F, Expansion of Existing Casino Alternative, also does not propose any additional dining outlets. Without compelling dining options, the casino will not be able to expand its reach from its current mix of customers.

Finally, the proposed expansion calls for 250 additional gaming positions without indication of their proposed location. GMA has assumed that these gaming positions would be located in a renovated area that currently houses the events center/bingo hall. It is GMA's professional opinion that this fails to achieve the economically optimal use of this expansive space.

In short, Alternative F is an entirely unreasonable alternative: (a) it suffers a fundamental design flaw by failing to direct patrons to the casino, (b) it involves no new dining outlets to expand customer mix, and (c) it fails to locate 250 additional gaming machines in an economically optimal space.

GMA FINDINGS AND RECOMMENDATIONS TO IMPROVE WIN RIVER

FINDINGS

Today, Win-River provides an adequate gaming-entertainment experience to what can best be described as blue-collar gaming customers. The casino's atmosphere, with its poor air handling is simply not appealing to people who are non-smokers. The non-smoking area, although adequate, is not a particularly appealing environment. Non-smokers are essentially shuttled off to an unattractive area, removed from the excitement and energy of the main casino.

The restaurants are adequate but not memorable. They do not offer the marketing appeal of nationally branded restaurant chains nor the unique charm of entrepreneur-based restaurants. The casino's food & beverage options are designed to serve existing casino customers. There has been no attempt made to create attractive dining and gaming areas that would appeal to higher-worth players. For those more discriminating gamers that reside in the area, they simply forego gambling at the Win-River Casino today because the current suite of amenities does not match their lifestyle. This is not to say that Win-River cannot be made more appealing. It most certainly can. The existing property can be judiciously upgraded to meet the needs of those gamers.

INTRODUCTION

It is GMA's professional opinion that the casino, entertainment venue, parking, and food & beverage options need to be elevated to a higher standard without alienating Win-River's existing players. The Win-River Hotel already offers a 3 ½ star lodging experience. The rest of the property needs to be brought up to that level. **Redding Rancheria will achieve a higher return on investment by expanding and repositioning the existing property for $43 million under the Modified Alternative F, then it would by spending $165 to $198 million on a new property at Strawberry Fields. GMA's Modified Alternative F is a clearly superior alternative to Alternatives A, B & C when considering the economic return to Redding Rancheria.** The following details attributes for a Modified Alternative F that would allow for an expansion of the existing facility that would result in increased net income to the Redding Rancheria. From a development and risk/return perspective, Redding Rancheria would be better served by pursuing this Modified Alternative F rather than constructing a new casino resort at the Strawberry Fields site.

T6-100
(Cont.)

A. RENOVATE EXISTING CASINO

The existing casino needs a modest renovation that should include new wall treatment, ceiling treatment and carpets. More important, the current air handling system must be replaced with a system capable of removing cigarette smoke from the air. Unless air quality is dramatically improved, Win-River will not be able to attract higher-worth gamers or entertainment seekers for whom dining and gambling are part of larger entertainment experience.

B. REBUILD AND RECONFIGURE EVENTS CENTER

Demolish the existing events center. The events center/bingo hall, currently housed in a steel building that appears to have been constructed prior to the construction of the main casino, is functionally obsolete and needs to be replaced. Its removal and replacement can take place without disrupting business in the main casino. In its place, construct a two-story addition with a new gaming area, two new restaurants and a premium player lounge on the main level and a purpose-built events center on the second level.

The main level of this new wing would accommodate 200 additional gaming devices, the majority in an attractive non-smoking environment with higher ceilings. In addition, this new space would house two new dining venues, designed to attract new market segments. GMA would propose a brew pub restaurant, serving lunch, dinner and late-night meals. This room would be modeled after Yard House or Buffalo Wild Wings.

In addition, the GMA would propose a 75-seat upscale restaurant. Serving dinner only, this restaurant would ostensibly feature a local celebrity chef or a second outpost for a popular local restaurant.

The second floor would feature a 1,000-seat events center, replacing the existing facility. Escalators from the second level would deliver patrons egressing the events center directly into the casino.

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(Cont.)

GARAGE

GMA would propose reducing the size of the proposed garage from 1,750-spaces to 1,000 spaces. In addition, the garage would connect to the casino via an overhead walkway. The walkway would connect to the casino at a point close to the hotel entrance, which would require patrons to walk through the casino in order to reach the events center and the new dining venues.

ADD A PREMIUM PLAYERS' LOUNGE

Within the newly expanded gaming space, GMA would also propose a premium players' lounge, capable of accommodating the casino's top tier players. The lounge, visible from portions of the casino floor, would feature comfortable seating, beverage service and complimentary snacks for VIP customers.

HOTEL

Without having access to hotel operating trends, occupancy rates and room rates, GMA cannot opine on any future hotel expansion. As such, GMA does not propose any hotel expansion at this time.

PROJECTED DEVELOPMENT COSTS FOR GMA'S MODIFIED ALTERNATIVE F

GMA adjusted the development cost estimates for Alternative F given its adjustments to the assumed scope for this alternative. This analysis was based on GMA's understanding of the per unit cost for similar development cost line items. The following table illustrates this development cost analysis.

GMA Modified Alternative F Development Scope and Cost Estimates

	Unit	Per Unit Cost	Cost
New Casino Space	6,000	$300	$ 1,800,000
Mix New and Popular Used Machines	200	$17,000	$ 3,400,000
Existing Casino Renovation	32,658	$175	$ 5,715,150
F&B	11,250	$425	$ 4,781,250
Event Center	15,000	$250	$ 3,750,000
Parking Garage	1,000	$17,500	$ 17,500,000
10% Contingency			$ 3,354,640
Soft Costs (Architecture, Financing, Etc.)			$ 3,019,176
TOTAL			**$ 43,320,216**

Source: GMA

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IV. GAMING MARKET ASSESSMENT

To project the potential revenue generated by the subject facility in each alternative scenario, GMA performed a Gaming Market Assessment, utilizing the gravity model methodology as previously described in Chapter II of this report.

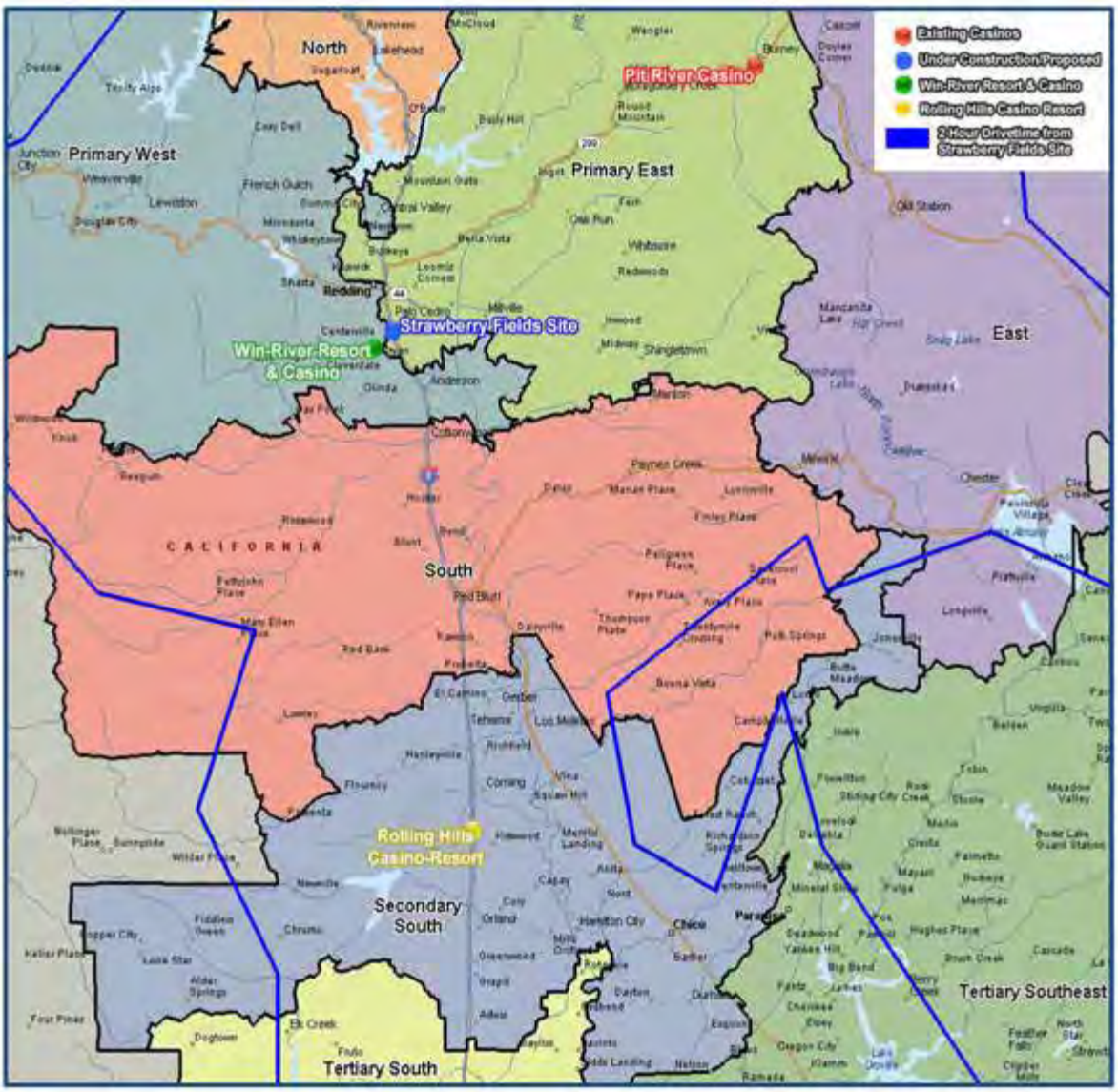
REGIONAL MARKET CARVE

The first step in performing the Gaming Market Assessment was to divide the greater market area into local market segments, utilizing demographic mapping software. The construction of these segments took into account variations in the demographic composition of each region, access to the market's existing and proposed gaming facilities, geographic barriers, roadway infrastructure, relative levels of traffic congestion, and the availability of other non-gaming entertainment activities.

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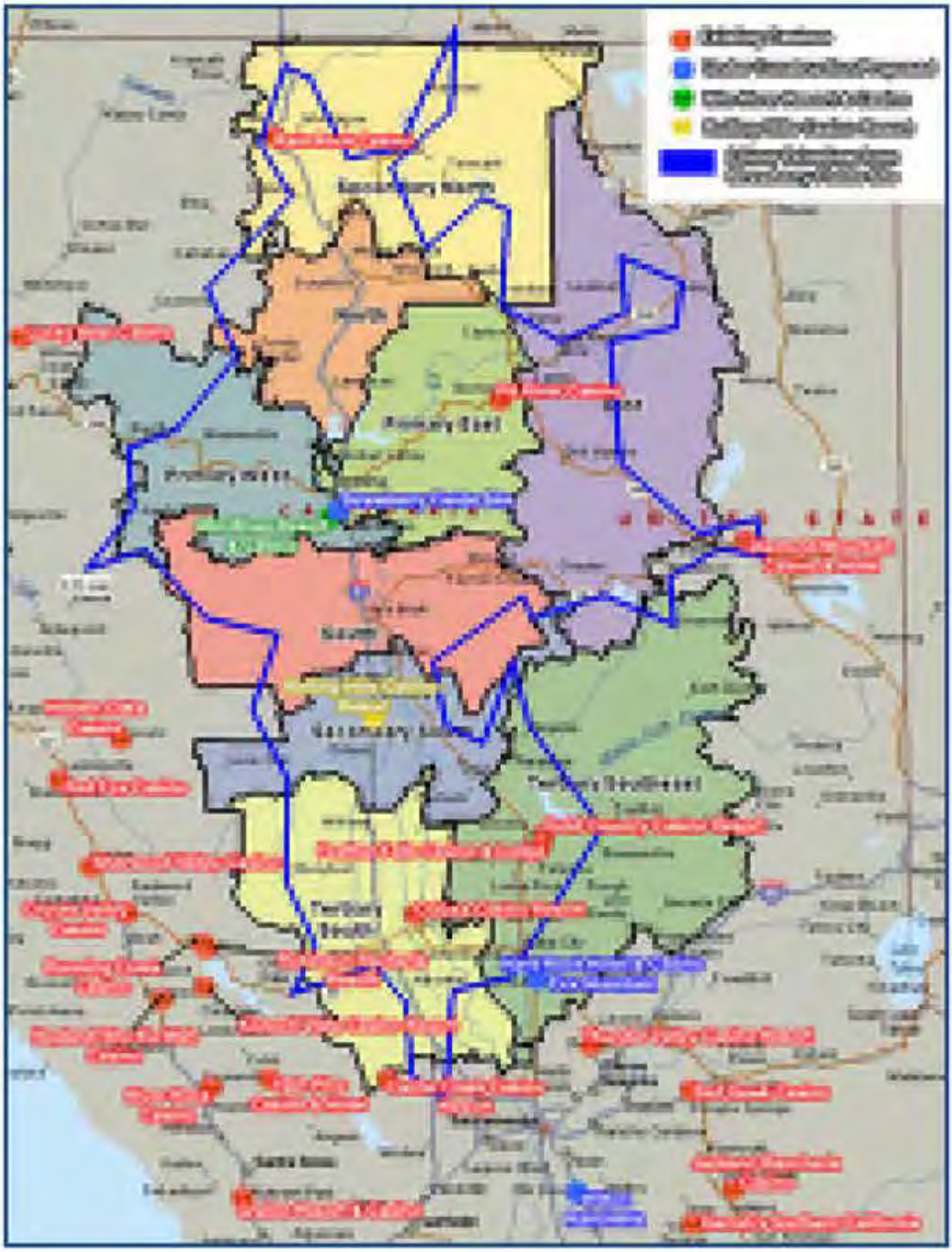
The maps on the following pages illustrate the nine market segments used in this analysis and the location of each casino in the region. The maps are followed by a brief discussion of the demographic composition of each individual market segment. For each market segment, total population, adult population (age 21 and over), and average annual household income ("AAHI") were quantified.

ZOOMED IN MARKET AREA MAP



T6-100 (Cont.)

ZOOMED OUT MARKET AREA MAP



T6-100
(Cont.)

DEMOGRAPHICS BY MARKET SEGMENT

TOTAL POPULATION

In 2018, the regional market's total population was estimated at 823,492. Low population growth rates are expected in the region, with total population expected to reach 839,204 at a compounded annual growth rate ("CAGR") of 0.51%. The Tertiary Southeast market segment is by far the largest with an estimated 347,741 residents, followed by the combined Primary market segments (Redding) and the Secondary South segment (Corning). The regional market's total population by market segment is listed in the following table.

Total Population

Market Segment	2018	2022	CAGR
Primary West	79,980	81,075	0.36%
Primary East	98,774	100,807	0.54%
North	12,085	12,034	-0.11%
South	47,154	47,854	0.39%
East	9,308	9,185	-0.36%
Secondary North	27,090	27,139	0.05%
Secondary South	160,683	164,699	0.66%
Tertiary South	40,677	41,311	0.41%
Tertiary Southeast	347,741	355,100	0.56%
TOTAL	**823,492**	**839,204**	**0.51%**

Source: PCensus, GMA

T6-100 (Cont.)

ADULT POPULATION

When examining the region by age, there were an estimated 607,741 residents aged 21 or older, representing 73.8% of the total population. The highest concentration of adults is found in the North market segment with 82.0% aged 21 or older, followed by the East market segment with 79.0%. The adult population is expected to reach 623,170 in 2022 at a CAGR of 0.67%. As the total population is projected to grow at a rate of 0.51%, this indicates an aging trend within in the defined region. The following table illustrates the adult population aged 21 and older for each market segment.

Adult Population (Age 21 and Over)			
Market Segment	2018	2022	CAGR
Primary West	60,178	61,165	0.43%
Primary East	74,393	76,221	0.65%
North	9,910	9,916	0.02%
South	35,007	35,757	0.57%
East	7,355	7,262	-0.34%
Secondary North	20,113	20,125	0.02%
Secondary South	116,621	121,038	1.00%
Tertiary South	28,488	29,140	0.61%
Tertiary Southeast	255,677	262,546	0.71%
TOTAL	**607,741**	**623,170**	**0.67%**

Source: PCensus, GMA

AVERAGE ANNUAL HOUSEHOLD INCOME

The average annual household income is relatively similar across each market segment, with the exception of the Secondary North segment. Overall, AAHI in the region in 2018 was estimated at $68,006, and it is expected to reach $72,886 in 2022 at a CAGR of 1.86%. The Primary East and Primary West market segments are expected to achieve the highest levels of annual growth at a projected CAGR of 2.42% and 2.17%, respectively. While the highest levels of AAHI are currently found in the Secondary South and Tertiary South market segments, it is expected that levels of AAHI growth in the Primary East segment will yield the highest overall level of AAHI at a projected $76,315 in 2022. The following table details AAHI by market segment.

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Average Annual Household Income			
Market Segment	2018	2022	CAGR
Primary West	$ 65,174	$ 70,650	2.17%
Primary East	$ 69,773	$ 76,315	2.42%
North	$ 63,734	$ 67,968	1.73%
South	$ 67,204	$ 72,433	2.02%
East	$ 69,506	$ 73,917	1.65%
Secondary North	$ 55,347	$ 58,666	1.57%
Secondary South	$ 70,504	$ 75,519	1.85%
Tertiary South	$ 70,930	$ 73,092	0.80%
Tertiary Southeast	$ 67,922	$ 72,484	1.75%
AVERAGE	**$ 68,006**	**$ 72,886**	**1.86%**

Source: PCensus, GMA

GAMING FACTORS AND OVERALL MARKET SIZE

Gaming factors consist of Propensity and Average Annual Win, which are discussed below. For the purposes of this assessment, GMA added an additional category to reflect the percentage of gamer visits that will accrue to casinos that were not included in the defined local market. This allowed the model to account for those visits lost to other jurisdictions such as Las Vegas, and it allowed the model's gaming factors to be calibrated to the actual behaviors of regional gaming patrons. The multiplication of these gaming factors by a market's adult population and its AAHI determined the gross levels of gaming revenue generated by the subject market.

PROPENSITY

Propensity represents the percent of the adult population (defined as people age 21 and over) that will visit a casino at least once in a given year. Propensity factors can vary significantly throughout the United States. At the high end of the scale is the local Las Vegas market in which almost 70% of adults will gamble. In rural sections of the country with few gaming options, this factor can be as low as 17%. In the defined regional market area, moderately high gaming factors are expected as this population has had exposure to gaming facilities for quite some time. These propensity factors are estimated to range from 37% to 42%.

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Gaming factors in the United States have remained fairly constant over the past few years and generally only change with the addition of new casinos. However, the onset of the recession had an estimated impact of negative one or two percentage points on these figures. In estimating gaming factors, GMA utilized proprietary research data gathered by GMA as well as other sources.

AVERAGE ANNUAL WIN

Average Annual Win ("Average Win") represents the amount of money a gamer in a market will lose on average to a casino over a twelve-month period. This factor is generally dependent on a player's average household income and distance that he/she must travel to reach a casino. Average Win is based on a percentage of a player's AAHI.

Average Win as a percent of gamers' annual income figures experienced in the defined market area is estimated to be moderate compared to other gaming markets around the country. Percent income figures in the market area range from 1.8% to 2.3%, compared to other gaming markets where this figure ranges between 1.1% and 2.6%.

GMA GRAVITY MODEL PROJECTIONS

MODEL CALIBRATION

By analyzing and estimating historical gaming revenue levels at each of the casino facilities in the competitive set, researching the number of gaming positions provided within each competitor's casino, visiting each facility to understand their relative aesthetic attractiveness (including a consideration of non-gaming amenities), and utilizing gaming factors from both public and proprietary sources, GMA was able to calibrate the gravity model to current market conditions. The calibration model yielded the amount of gaming revenue generated by each market segment for each gaming facility in the competitive set, as well as the local market overall. Then, GMA adjusted gaming revenue levels to account for incremental gaming revenue that is generated by the outer market.

BASE SCENARIO, 2022

Once the gravity model was calibrated, GMA grew the model to the subject year. The Base Scenario assumed that the Proposed Project does not open and that only other expected and assumed changes to the market will occur during the forecast period. Additionally, in this scenario, GMA assumed that the Rolling Hills Casino will undergo modest gaming and non-gaming renovations and expansions (as detailed previously in this report). The Base Projections model also factored in expected growth/decline in demographics as previously summarized in this chapter.

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ALTERNATIVE A SCENARIO, 2022

In the Alternative A Scenario, GMA layered in the impact of the Proposed Project utilizing the Alternative A development scope, as detailed in the Draft EIS and this report. GMA notes that a new casino-hotel resort located along I-5 in the Primary East market segment would stimulate additional, but marginal market growth in the Primary East/West and North market segments. However, since the regional population is already served by several quality gaming options, it is expected that a new market entrant will generate an overwhelming majority of its gaming revenue by cannibalizing other market area competitors. As such, gaming revenue for the Proposed Project in this alternative is expected to stem largely from the cannibalization of other gaming facilities in the regional market area.

Historically, Win-River has primarily drawn customers from the local Redding area. Due to its indirect access to I-5, Win-River is less reliant on outer market patronage from highway travelers. As such, a relocated and greatly expanded casino resort development in the Alternative A scenario would increase patronage from within the local market, as well as outer market patronage from highway travelers along I-5. Additionally, Alternative A would provide similar, if not improved, access to local populations in and around Redding.

The greatest impact in this alternative is expected to stem from the outer market, which is expected to generate $10.3 million. Overall, the Project is projected to generate $103.3 million in gaming revenue in 2022 in this scenario.

ALTERNATIVE B SCENARIO, 2022

In the Alternative B scenario, GMA layered in the impact of the Project utilizing the Alternative B development scope, as detailed in the Draft EIS and this report. As was the case with the Alternative A Scenario, the regional market is expected to grow marginally in this scenario, with the Proposed Project's gaming revenue expected to stem largely from the cannibalization of other gaming facilities in the regional market area. Additionally, the greatest impact is expected to stem from increased outer market business, although to a slightly lesser extent than in the Alternative A Scenario.

In this scenario, the Proposed Project is expected to generate $102.7 million in gaming revenue in 2022. Of that total, $10.2 million is expected to stem from the outer market. Projections for both the local and outer market in this scenario are slightly lower compared to Alternative A, as the exclusion of the retail component in Alternative B would slightly decrease incremental visitation driven by the Project's non-gaming offering.

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ALTERNATIVE C SCENARIO, 2022

In the Alternative C Scenario, GMA layered in the impact of the Proposed Project utilizing the Alternative C development scope as detailed in the Draft EIS. As was the case with the Alternative A and Alternative B scenarios, the regional market is expected to grow marginally in this scenario, with the Proposed Project's gaming revenue expected to stem largely from the cannibalization of other gaming facilities in the regional market area. Additionally, the greatest impact is expected to stem from increased outer market business, although to a lesser extent than in the Alternative A and Alternative B scenarios.

In this scenario, the Proposed Project is expected to generate $97.0 million in gaming revenue in 2022. Of that total, $9.7 million is expected to stem from the outer market. Projections for both the local and outer market in this scenario are slightly lower compared to Alternatives A and B, as the development scope of Alternative C consists of reduced gaming amenities and a slightly reduced set of non-gaming amenities compared to Alternative A. However, Alternative C would include a regional retail facility of the same size and scope as defined in Alternative A.

GMA'S MODIFIED ALTERNATIVE F SCENARIO, 2022

In the Alternative F Scenario, GMA layered in the impact of the Project, utilizing the Alternative F development scope defined by GMA's proprietary findings and recommendations for development, as outlined in Chapter III of this report. The local market gaming revenue generated in the Alternative F Scenario is expected to be lower in comparison to Alternatives A, B, and C. This is due to the fact that the Project would garner a lower attraction factor in Alternative F, which would be developed on the existing Win-River Resort & Casino site that does not enjoy convenient access to highway travelers along I-5. In this scenario, the Proposed Project is expected to generate $85.1 million in gaming revenue in 2022. Of that total, $2.6 million is expected to stem from the outer market.

GAMING REVENUE SUMMARY

It is important to note that these gaming revenue estimates are representative of slot and table game revenue as the gravity model is calibrated to these figures. However, GMA adjusted its projections to account for anticipated levels of bingo and poker revenue within the ProForma income statement analysis of this report.

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Win-River Gaming Revenue Projections by Scenario

	Calibration	Alternative A	Alternative B	Alternative C	Modified Alternative F
Local Market	$ 69,499,824	$ 92,925,268	$ 92,445,370	$ 87,312,213	$ 82,552,340
Outer Market	$ 2,149,479	$ 10,325,030	$ 10,271,708	$ 9,701,357	$ 2,553,165
TOTAL	**$ 71,649,303**	**$ 103,250,297**	**$ 102,717,078**	**$ 97,013,569**	**$ 85,105,505**

Source: GMA

V. PROFORMA INCOME STATEMENT ANALYSIS

As previously mentioned, GMA prepared a proforma income statement analysis for each scenario. The results of this analysis illustrate the projected EBITDA expected to be generated by the Project for Alternatives A, B, C, and GMA's Modified Alternative F.

As a basis for the construction of each proforma income statement, GMA utilized the operating margins estimated in GMA's 2018 expert consultation report that estimated Win-River's 2017 revenues and expenses. Then, GMA adjusted the margins to account for how the assumed alternative scope assumptions would affect operational performance. In performing these adjustments, GMA relied on its knowledge of operating margins achieved at relevant casino-hotels in similar markets. The following is a discussion of the key components of the ProForma Income Statement analysis.

REVENUES

Gaming: GMA utilized the gaming revenue projections prepared within this assessment to estimate the amount of slot and table game revenue that would be generated by the Project in each alternative. This analysis was based on GMA's understanding of the gaming revenue split between slots and tables at comparable facilities in similar jurisdictions. GMA then estimated bingo and poker revenue based on its understanding of how these gaming revenue departments contribute to revenue on a margin basis.

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Hotel: To project hotel rooms revenue under each alternative scenario, GMA utilized key assumptions from the PFA Report. Specifically, a 78% occupancy was projected in the PFA Report for the proposed 250-key hotel in Alternatives A, B, and C. This occupancy equated to 71,175 room nights of demand ("RND"), of which 58,353 and 54,297 RND were allocated to Casino customer RND in Alternatives A/B and C, respectively (according to the PFA Report). GMA assigned an internal average daily rate ("ADR") of $95 for Casino-based RND. GMA estimated the remaining RND's average daily rate at $150 based on a historical trend analysis provided by Smith Travel Research. Given the assumed amenity set of the Project in the Strawberry Fields alternatives, the proposed hotel is expected to garner a premium rate in 2022. As a result, GMA projected the overall blended ADR for the hotel at $105 to yield approximately $7.5 million in hotel rooms revenue (this blended rate of $105 is consistent with the PFA Report).

GMA notes that the Casino-based RND presented in the PFA Report is aggressive as it equates to roughly 80% of total RND. This is particularly not in-line with what is achieved by a hotel project that is located along a major interstate highway and in a hotel market that primarily serves traffic

intercept demand. Furthermore, the amount of carded/tracked play and likely size of Redding Rancheria's player database simply does not support such a high volume of Casino RND.

For Alternative F, GMA assumed a conservative hotel occupancy of 85% at an ADR of $95 to yield $2.5 million in rooms revenue.

Hotel Other: Hotel Other Revenue was estimated based on relevant spend per RND metrics and factored in an increased spend per RND amount for the Strawberry Fields alternatives.

Food & Beverage: GMA conservatively estimated Food & Beverage revenue at 12% of overall gaming revenue in the 2017 study. Given the enhanced food & beverage program assumed in each alternative, GMA increased this margin to account for the larger and more attractive assumed programs.

Entertainment & Meetings: GMA estimated Entertainment revenues based on a margin basis achieved at similar venues operating in comparable jurisdictions. Meeting & Banquet revenue was projected utilizing relevant spend per group RND metrics.

Spa, Retail & Other: Spa revenue was estimated using relevant capture rates of overall RND and the application of spend per treatment metrics achieved at comparable facilities.

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Retail Center: GMA assumed Retail Center revenues as presented in the PFA Report applicable to Alternatives A and C only at $46.9 million.

FREEPLAY

GMA assumed that Redding Rancheria would reduce the amount of free play it offers as a percentage of gross slot revenue from GMA's estimate of current levels at approximately 8.5%. As a result, GMA assumed free play would equate to 7.5% of gross slot revenue in the stabilized year for the Strawberry Fields alternatives.

PROMOTIONAL ALLOWANCES

GMA estimated Promotional Allowances by calculating the amount of hotel revenues, F&B revenues and other revenues that would be given to customers on a complimentary basis. Hotel comp expense was assumed to equal all casino rooms revenue per the PFA Report. Food & Beverage comp expense was assumed at 40% of total F&B revenue in the Base Scenario and Alternative F. This percentage was lowered to 30% in the Strawberry Fields alternatives.

OPERATING EXPENSES

Departmental expenses were estimated on a margin basis. Departmental expense margins were based on GMA's estimates from the 2018 study in which GMA estimated revenues and expenses for the Win-River Resort & Casino in 2017. These margins were then adjusted to account for the proposed projects as detailed in the Draft EIS for Alternatives A, B, and C. Additionally, departmental expense margins were adjusted based on GMA's knowledge of expense margins experienced at similarly sized gaming facilities in relevant markets.

Given the high levels of expenses in operating and maintaining a large-scale retail shopping complex as proposed in Alternatives A and C, GMA assumed a 90% expense margin for Retail Center revenue. The remaining 10% of gross margin for the Retail Center is comprised of an assumed 7% collection of sales and rent in addition to 3% for common area maintenance charges. EBITDA margin is expected to be significantly lower in Alternatives A and C as a result of the tight margin associated with the Retail Center. A more comparable EBITDA margin to what Win-River achieves today is expected in GMA's Modified Alternative F.

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While it was assumed that ample money will be spent on pre-opening marketing and training, these figures were not included within this report as those expenses were assumed to be included in the overall project development budget.

PROFORMA INCOME STATEMENT SUMMARY BY ALTERNATIVE

Projected Redding Rancheria ProForma Income Statement by Alternative

	Win-River 2017 GMA Report Est.	Win-River 2022 Base Projections	SB Fields 2022 Alternative A	SB Fields 2022 Alternative B	SB Fields 2022 Alternative C	Win-River 2022 Modified Alt F
# Slot Machines	650	700	1,200	1,200	825	900
Win Per Slot	$279	$268	$215	$213	$293	$238
# Tables	12	12	36	36	21	12
Win Per Table	$1,015	$1,361	$707	$704	$1,139	$1,554
# Poker Tables	5	5	8	8		5
Win Per Poker Table	$363	$376	$257	$256		$378
# Rooms	84	84	250	250	250	84
RND	23,111	23,111	71,175	71,175	71,175	26,061
Occupancy	75.4%	75.4%	78.0%	78.0%	78.0%	85.0%
ADR	$94	$93	$105	$105	$105	$95
	2017	2022	2022	2022	2022	2022
REVENUES						
Slots	$ 66,247,738	$ 68,530,869	$ 93,957,771	$ 93,472,541	$ 88,282,348	$ 78,297,064
Tables	$ 5,760,673	$ 5,959,206	$ 9,292,527	$ 9,244,537	$ 8,731,221	$ 6,808,440
Poker	$ 662,477	$ 685,309	$ 751,662	$ 747,780	$ -	$ 689,014
Bingo	$ 132,495	$ 137,062	$ -	$ -	$ -	$ -
GAMING REVENUE	**$ 72,803,383**	**$ 75,312,445**	**$104,001,960**	**$103,464,858**	**$ 97,013,569**	**$ 85,794,519**
Food & Beverage	$ 8,736,406	$ 9,037,493	$ 15,080,284	$ 14,485,080	$ 14,066,968	$ 11,582,260
Hotel Rooms	$ 2,169,898	$ 2,158,200	$ 7,466,258	$ 7,466,258	$ 7,466,258	$ 2,476,489
Hotel Other	$ 138,666	$ 145,599	$ 498,225	$ 498,225	$ 498,225	$ 169,397
Spa	$ 104,000	$ 114,824	$ 163,374	$ 163,374	$ 163,374	$ 129,481
Entertainment Venue	$ 412,500	$ 426,716	$ 1,040,020	$ 1,034,649	$ 1,018,642	$ 1,029,534
Meetings & Banquets	$ 104,000	$ 109,200	$ 293,597	$ 293,597	$ 293,597	$ 215,003
Retail & Other	$ 1,274,059	$ 1,317,968	$ 1,820,034	$ 1,810,635	$ 1,697,737	$ 1,501,404
Retail Center	$ -	$ -	$ 46,900,000	$ -	$ 46,900,000	$ -
GROSS REVENUE	**$ 85,742,912**	**$ 88,622,446**	**$177,263,751**	**$129,216,675**	**$169,118,370**	**$ 102,898,086**
Free Play	$ 5,631,058	$ 5,825,124	$ 7,046,833	$ 7,010,441	$ 6,621,176	$ 6,655,250
Promotional Allowances	$ 4,417,709	$ 4,558,949	$ 10,240,309	$ 10,061,278	$ 9,544,879	$ 5,649,811
NET REVENUE	**$ 75,694,145**	**$ 78,238,373**	**$159,976,609**	**$112,144,957**	**$152,952,315**	**$ 90,593,025**
EXPENSES						
Slots	$ 5,299,819	$ 5,482,470	$ 7,516,622	$ 7,477,803	$ 6,621,176	$ 6,263,765
Tables	$ 2,999,294	$ 3,102,661	$ 5,296,740	$ 5,269,386	$ 4,627,547	$ 3,199,967
Poker	$ 563,106	$ 582,512	$ 638,913	$ 635,613	$ -	$ 585,662
Gaming Tax	$ 2,649,910	$ 2,741,235	$ 3,758,311	$ 3,738,902	$ 3,531,294	$ 3,131,883
Bingo	$ 125,871	$ 130,209	$ -	$ -	$ -	$ -
Cage & Count	$ 1,528,871	$ 1,581,561	$ 1,768,033	$ 1,758,903	$ 1,649,231	$ 1,630,096
Food & Beverage	$ 8,299,586	$ 8,585,619	$ 14,326,270	$ 13,760,826	$ 13,363,619	$ 10,713,591
Hotel	$ 807,997	$ 806,330	$ 2,468,990	$ 2,468,990	$ 2,468,990	$ 899,601
Entertainment Venue	$ 577,500	$ 597,403	$ 1,248,024	$ 1,241,578	$ 1,222,371	$ 1,235,441
Meetings & Banquets	$ 67,600	$ 70,980	$ 190,838	$ 190,838	$ 190,838	$ 139,752
Retail & Other	$ 764,436	$ 790,781	$ 1,092,021	$ 1,086,381	$ 1,018,642	$ 900,842
Retail Expenses	$ -	$ -	$ 42,210,000	$ -	$ 42,210,000	$ -
G&A	$ 3,429,716	$ 3,544,898	$ 4,171,640	$ 4,005,717	$ 4,155,425	$ 3,601,433
Marketing	$ 5,573,289	$ 5,765,365	$ 7,961,622	$ 7,920,505	$ 7,426,642	$ 6,567,795
Maintenance & Engineering	$ 3,172,488	$ 3,279,030	$ 5,672,440	$ 4,522,584	$ 5,411,788	$ 3,601,433
Security/ Surveillance	$ 1,714,858	$ 1,772,449	$ 2,304,429	$ 2,067,467	$ 2,198,539	$ 1,795,572
TOTAL EXPENSES	**$ 37,574,340**	**$ 38,833,501**	**$100,624,891**	**$ 56,145,493**	**$ 96,096,102**	**$ 44,266,832**
EBITDA	**$ 38,119,805**	**$ 39,404,872**	**$ 59,351,718**	**$ 55,999,464**	**$ 56,856,213**	**$ 46,326,193**
EBITDA Margin (Gross)	44.5%	44.5%	33.5%	43.3%	33.6%	45.0%

Source: GMA

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CONCLUSIONS

GMA's findings are that: (i) Alternative F in the Draft EIS was an illogical expansion suggestion that was not reasonable from the perspective of economic return to Redding Rancheria; (ii) there was a much more attractive alternative to Alternative F that should have been presented and reviewed (as described herein, the "Modified Alternative F"; (iii) the incremental gross revenue projections prepared and presented by Pro Forma Advisors LLC ("PFA") within the Draft EIS overstated expected incremental gross revenues for Alternative A; (iv) measuring incremental gross revenue projections is neither a reasonable nor a proper way to assess economic return to Redding Rancheria as it does not consider the payments for financing the development costs, assessment of operating costs and therefore illustrating the additional cash flow available to Redding Rancheria; and (v) using proper methodology and alternatives, that the Modified Alternative F is clearly preferable from the perspective of assessing economic return to Redding Rancheria to any other Alternative.

For its conclusions on economic return to Redding Rancheria, the Draft EIS relies entirely on the incremental revenue projections prepared and presented by PFA for Alternatives A, B, C, and F. Specifically, the Redding Rancheria Strawberry Fields EIS Economic Analysis report ("PFA Report"), which presents PFA's findings, appears in Volume II, Appendix A of the Draft EIS. The PFA Report projected the potential performance of a Redding Rancheria project under the six different alternative development scenarios and illustrated projected incremental gross revenues by major department, estimated economic impacts tied to each alternative, as well as project development costs for each alternative (summarized in the following table).

T6-100
(Cont.)

Pro Forma Advisors - Redding Rancheria Draft EIS Projections						
In USD millions	Alt A	Alt B	Alt C	Alt D	Alt E	Alt F
Casino GGR*	$34.7	$34.7	$24.6	-	$27.9	$2.9
Hotel*	$5.6	$5.6	$4.7	$1.8	$5.1	-
Retail*	$46.9	-	$46.9	$42.7	$42.7	-
F&B and Other*	$4.9	$4.9	$4.0	$2.9	$4.3	$1.6
TOTAL REVENUE*	**$92.1**	**$45.2**	**$80.2**	**$47.4**	**$80.0**	**$4.5**
Casino-Hotel Development Cost	$165.9	$165.9	$147.8	$35.9	$190.9	$43.3
Retail Development Cost	$32.5	-	$32.5	$30.0	$30.0	-
TOTAL DEVELOPMENT COST	**$198.4**	**$165.9**	**$180.3**	**$65.9**	**$220.9**	**$43.3**
Total Economic Impact	$352.8	$272.1	$323.4	$128.7	$375.2	$63.9
Direct Economic Impact	$225.8	$173.3	$207.4	$83.5	$240.7	$40.5

Source: Pro Forma Advisors LLC **Incremental*

The PFA Report only addressed incremental gross revenues. Analytically, the reliance on projected incremental revenue to determine the feasibility of a project is flawed and is not the proper way to assess economic return to Redding Rancheria. This approach fails to address financing costs, operating and ongoing maintenance and capital expenses for the Alternatives

and thus does not include an estimate of return on investment or actual projected cash flow available to Redding Rancheria for each Alternative.

The flaws in this approach are compounded by the fact that Alternative F as set forth in the Draft EIS makes no economic sense, and that the Draft EIS fails to describe a potential development scenario on the existing site that would provide a positive economic return to Redding Rancheria.

In 2022, GMA's incremental gaming revenue projections were lower when compared to PFA's Strawberry Fields alternative projections (A, B, and C), although much higher for Alternative F based on GMA's Modified Alternative F as described within this document. Under GMA's Modified Alternative F, Redding Rancheria could realize an incremental $13.0 million in casino gross gaming revenue ("GGR"). The Draft EIS Alternative F incremental gaming revenue projections are low because the components that comprise Alternative F would not result in a significant amount of increased gaming revenue and do not make any economic sense. The potential performance of an improved and expanded Win-River Resort & Casino at its current location under GMA's Modified Alternative F would generate a healthy amount of incremental revenue and would be economically viable.

Comparison of Incremental Gaming Revenue Projections

	Alt A	Alt B	Alt C	Alt F
GMA*	$ 31,198,576	$ 30,661,475	$ 24,210,186	$ 12,991,136
PFA	$ 34,700,000	$ 34,700,000	$ 24,600,000	$ 2,900,000

Source: GMA, Pro Forma Advisors LLC
**For Alternative F, projections are shown for GMA's Modified Alternative F*

T6-100
(Cont.)

Incremental gaming revenues are of course only a first step in assessing the full picture of economic return. A project with high gross revenues but low cash flow (whether due to high development costs, high operating expenses or both) obviously is neither preferable nor superior to a project with somewhat lower gross revenue but higher cash flow (whether due to lover development costs, lower operating expenses or both).

Thus, to address this properly, with the incremental gaming revenue projections complete, GMA prepared a proforma income statement analysis to project earnings before interest, taxes, depreciation, and amortization ("EBITDA") for each development alternative. GMA utilized the 2017 EBITDA estimate prepared by GMA in the June 2018 study titled "Expert Consultation: 2017 Property Performance Estimate – Win-River Resort & Casino" to understand how each alternative could incrementally benefit Redding Rancheria from a true and complete economic return analysis.

EBITDA is compared to project development costs to estimate a project's economic feasibility and return. Typically, in the gaming industry, developments are not feasible when the multiple

of EBTIDA to development cost is greater than 7.5. EBITDA multiple in this case is simply the total project cost divided by the projected EBITDA in the subject year. It is an important and widely used valuation metric across the casino industry used to evaluate the feasibility of a project because it approximates how many years of EBITDA would be required to pay off the project cost. Given development cost expectations in each alternative, the Strawberry Fields Site alternatives are expected to generate multiples of EBITDA to development cost between 9.9 and 10.3, making Alternatives A, B, and C economically unfeasible. A lower EBITDA multiple is favorable because it means that a project cost can be paid off faster allowing for earnings to directly benefit the developer (here the Redding Rancheria) sooner. A higher EBITDA multiple means that more cash flow will be tied up over a longer period of time to pay off the project cost.

At the same time, Alternative F as defined in the Draft EIS makes no economic sense because it involves irrational buildouts. GMA's Modified Alternative F presents a feasible and superior development scenario with an EBITDA multiple of 6.3, which would be highly financeable and provide additional net income to the Redding Rancheria while carrying only a minimal amount of risk. This would be highly financeable as the total project cost ($43.3 million) is less than a 1 multiple of total facility EBITDA (2018 estimated EBITDA of $39.4 million + an incremental $6.9 million = $46.3 million.)

To further illustrate the complete picture of economic return, GMA prepared the following table to illustrate the net benefit to Redding Rancheria. GMA took into account interest expense assuming debt service of the total amount borrowed and additional maintenance expenses that would be associated with financing these types of projects. These incremental expenses need to be deducted from incremental EBITDA generated to yield net operating income ("NOI") due to the proposed development. For purposes of this document, and based on current financial market conditions, GMA assumed that should Redding Rancheria be successful in raising money for the Strawberry Fields site that the interest rate would approximate 10%.[2] A lower interest rate was assumed for Alternative F at 6.5% due to it being an expansion and renovation of an existing property with stabilized EBITDA. It is likely that this rate could be as low as 5.5%, depending on how much existing debt is on the property today. Expansions and renovations on existing properties are underwritten as less risky relative to brownfield or greenfield developments, which a Strawberry Fields development would be considered.

T6-100
(Cont.)

[2] For purposes of this analysis, this rate was applied against the total project costs as it is unknown if the Redding Rancheria intends to utilize their own equity (which would have an opportunity cost associated with it). In addition, as stated in the text, it is unknown if financing costs, contingency and other soft costs are included in the estimated project costs for Alternatives A, B and C. For GMA's modified Alternative F, a contingency and soft cost are included. Financing costs would likely be minimal as financing could likely be through a conventional bank loan.

When considering these additional expenses, NOI will be negative under Alternatives A, B, and C. On the other hand, the Modified Alternative F could provide an incremental positive NOI of $3.7 million to Redding Rancheria.

Projected Impact of Alternative Development Scenarios on Redding Rancheria Performance

	Win-River 2022 Base Projections	SB Fields 2022 Alternative A	SB Fields 2022 Alternative B	SB Fields 2022 Alternative C	Win-River 2022 Alt F / Mod. Alt F
PFA Total Incremental Revenue (Draft EIS)		$ 92,100,000	$ 45,200,000	$ 80,200,000	$ 4,500,000
GMA Total Incremental Revenue (vs. '17)*	$ 2,879,534	$ 91,520,839	$ 43,473,764	$ 83,375,459	$ 17,155,174
GMA Projected EBITDA*	$ 39,404,872	$ 59,351,718	$ 55,999,464	$ 56,856,213	$ 46,326,193
Incremental EBITDA (vs. '22)*	$ -	**$ 19,946,846**	**$ 16,594,592**	**$ 17,451,341**	**$ 6,921,321**
Project Cost (From PFA except Alt F)*		$ 198,400,000	$ 165,900,000	$ 180,300,000	$ 43,320,216
Multiple of Incremental EBITDA*		**9.9**	**10.0**	**10.3**	**6.3**
Multiple of TOTAL EBTIDA*		**3.3**	**3.0**	**3.2**	**0.9**
Net Operating Income Analysis					
Assumed Interest Rate		10.0%	10.0%	10.0%	6.5%
Interest Payment*		$ 19,840,000	$ 16,590,000	$ 18,030,000	$ 2,815,814
Incremental Maintenace Capex*		$ 1,830,417	$ 1,086,844	$ 2,084,386	$ 428,879
Incremental Net Operating Income**		**$ (1,723,571)**	**$ (1,082,252)**	**$ (2,663,045)**	**$ 3,676,628**

Source: GMA, Pro Forma Advisors LLC
**asterisk indicates projections shown utilizing GMA's Modified Alternative F*
***Net Operating Income = EBITDA less Interest Payment and Maintenance Capex*

T6-100 (Cont.)

Redding Rancheria will achieve a higher return on investment by expanding and repositioning the existing property for $43 million under the Modified Alternative F, as detailed within this document, than it would by spending $165 to $198 million on a new property at Strawberry Fields. GMA's Modified Alternative F is a clearly superior alternative to Alternatives A, B & C when considering the economic return to Redding Rancheria.

VI. APPENDICES

FIRM QUALIFICATIONS

GMA provides clients with gaming market assessments, feasibility studies, primary research, economic impact studies, due diligence, payroll control, operations analysis, business and marketing plan development, and player reward program design for the gaming, hospitality, and tourism industries. The principals and associates of GMA have hands-on experience in nearly all aspects of the gaming industry including domestic and international operations, project development, marketing expertise, and detailed market analysis.

GMA is a (Nevada) Limited Liability Corporation with offices in Las Vegas, NV, Denver, CO, and Bangkok, Thailand. Below is the contact information for the company's partners.

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STEVEN M. GALLAWAY

Steve Gallaway is Managing Partner at Global Market Advisors. His areas of expertise include gaming market assessments, hotel and casino feasibility studies, operational reviews and marketing analysis.

Mr. Gallaway has spent his entire career in the gaming and hospitality industry, starting as a valet attendant and eventually rising to chief operating officer and managing partner of a casino in Colorado. Prior to forming GMA, he served as senior vice president of a hospitality consulting firm where he honed his craft in the fields of gaming market assessments and feasibility analysis. During the span of his career, Steve developed hands-on experience in operations management, organizational development, project development, business development, process improvement, contract negotiations, employee development, and customer service training.

In 2005, along with Andrew Klebanow, Mr. Gallaway formed Gaming Market Advisors. In 2014 the firm was rebranded as Global Market Advisors, reflecting the company's evolution as an international gaming, tourism and hospitality consulting firm.

Mr. Gallaway has completed over 300 feasibility studies, with a strong focus on international gaming operations and integrated resort development. Mr. Gallaway has worked on more than 60 projects in Asia, Western and Eastern Europe, the Caribbean, Central America, Canada, and Australia. His knowledge and understanding of emerging markets, particularly those in Asia, has led him to advise institutional investors on new market opportunities in that region, as well as an advisor on established markets. Today, Steve's clients include most public gaming companies, investment banks, private developers and government institutions.

Mr. Gallaway is a visiting lecturer at the University of Nevada Reno's School of Continuing Education where he teaches a class on casino feasibility analysis and marketing measurement. He is a periodic contributor to Global Gaming Business Magazine and Indian Gaming Magazine and has spoken at G2E Las Vegas and the Asian Gaming Congress.

Mr. Gallaway graduated from Boston College with a B.A. in Economics.

ANDREW KLEBANOW

Andrew Klebanow specializes in Marketing Plan and Business Plan Development, Market Research, Casino Property Analysis, Service Quality Measurement Programs and Player Rewards Program Design exclusive to the gaming and hospitality industries.

Mr. Klebanow has worked in the hospitality industry since 1975 and in the fields of marketing and business planning since 1991. He earned a Bachelor of Arts degree at New York University and Master's Degree in Marketing from Cornell University's School of Hotel Administration.

From 1991-1993, he was Director of Marketing at Sahara Gaming Corporation's Hacienda Hotel and Casino and Director of Marketing and Planning for the parent company's Development Group.

Mr. Klebanow also worked as Director of Marketing for Alliance Gaming Corporation where he conducted the initial market research, consumer testing and marketing plan development for Gamblers Bonus, the industry's first cardless slot club for the company's Nevada slot route division. Gamblers Bonus was the first player tracking system that allowed customers to redeem bonus points for game credits at the machine.

As a consultant to Horseshoe Gaming, Klebanow conducted an analysis of the gaming market in Tunica, MS and subsequently prepared its pre-opening business and marketing plans. In addition, Mr. Klebanow wrote the opening marketing plan for the Horseshoe Casino in Bossier City, LA.

From 1996 to 1999, Klebanow was Vice President of Marketing for Santa Fe Gaming Corporation, where he oversaw the marketing efforts for the Santa Fe Hotel and Casino in Las Vegas and the

Pioneer Hotel and Gambling Hall in Laughlin NV. During his tenure at Santa Fe Gaming, his team repositioned both casinos' player rewards programs to better meet the needs of the business. His most recent position was that of Vice President of Marketing at Sam's Town Hotel and Gambling Hall, where he oversaw the repositioning of the 22-year-old gaming property and the re-branding of its player rewards program.

Mr. Klebanow formed his own consulting firm in 2001 and, together with Mr. Gallaway, formed Gaming Market Advisors in 2005. In 2013, Gaming Market Advisors acquired the consulting firm Galaviz and Co, and rebranded as Global Market Advisors, where Mr. Klebanow is a partner today.

Mr. Klebanow is a periodic lecturer at Cornell University's School of Hotel Administration and the University of Nevada Reno's School of Continuing Education. Mr. Klebanow has authored over 100 articles in Indian Gaming Magazine, Global Gaming Business, In Asian Gaming and in the online gaming publication Urbino.net. He has also contributed academic papers to the Cornell University Hotel and Restaurant Quarterly and the UNLV Hospitality Journal. Mr. Klebanow has written extensively on the subject of player reinvestment and has developed methodologies for calculating a casino's player reinvestment rate. Recently, he focused his attention on casino development in urban environments and published a paper on that subject.

Over the past twenty years Mr. Klebanow has spoken at a number of gaming conferences. He delivered a presentation on Player Reinvestment and Tiered Player Reward Program Design at the Asian Gaming Congress 2010 and on Casino Development in Eastern Russia in 2012. At G2E Asia 2010 he delivered a one-hour presentation entitled "Say My Name: The Application of Loyalty Programs in Asia." He also served as a panelist at G2E Asia 2011 on the Korean gaming market and in 2012 on the Manila gaming market. In 2013 he moderated a panel on marketing communications in Asia.

Mr. Klebanow also moderated panels and shared the lecture podium at G2E Las Vegas. In 2012 he moderated a panel discussion entitled "Risk and Rewards: Understanding Player Reinvestment." In 2013 he conducted a seminar entitled "An Introduction to Casino Operations" and spoke as a panelist in a session on Trends in Asian Tourism.

In April of 2015 he presented a paper entitled "Casinos and the City" at the Third Annual Asia Pacific Conference on Gambling and Commercial Gaming Research in Beijing and moderated a panel on Trends in Electronic Casino Marketing Communications at the Casino Marketing and Technology Conference in Las Vegas. Most recently, he moderated panel discussions on Gaming in Vietnam, Gaming in Regional Philippine Gaming Markets and Proxy and Digital-Live Gaming at the 2017 and 2018 ASEAN Gaming Summit. He also moderated a panel on Casino Entertainment and Technology at 2018 G2E Asia.

BRENDAN BUSSMANN

Brendan Bussmann, Partner and Director of Government Affairs is a seasoned executive that has an extensive background in government affairs, communications, and business development in the sectors of hospitality, healthcare, energy, higher education, and sports.

In 2015, Bussmann founded his own public affairs and strategic development consultant firm focusing on domestic and international opportunities for clients in hospitality, healthcare, energy, and engineering. He continues to successfully implement strategies, as well as develop and expand new markets for various clients.

Prior to starting his own firm, he served as Vice President of Strategic Development and Marketing for Sunrise Hospital & Medical Center and Sunrise Children's Hospital. During his tenure, he successfully doubled EBITDA in a two-year period while also improving their image and relationship with the community, media, and other stakeholders. Prior to joining Sunrise, Bussmann served as Director of Community Relations with University Medical Center, where he built an external affairs program from scratch.

Bussmann has extensive gaming and hospitality experience from his tenure at Las Vegas Sands Corp. where he served as Director of Government Relations and Community Development. While in this capacity, he was part of the team that secured two gaming licenses in Pennsylvania and Singapore, oversaw ballot initiatives, and numerous legislative victories at the local, state, federal, and international levels. He also implemented the global programs for responsible gaming and community development.

Additionally, Mr. Bussmann has an extensive background in collegiate athletics, having worked at one of the premiere Power 5 Conference institutions in the United States. Bussmann spent eight years working for the University of Nebraska Athletic Department and football program. During his tenure, he oversaw and was involved in administration, operations, marketing, development, compliance, recruiting, and facility design for the football program and numerous other sports. He is keenly aware of the current college athletic landscape as he continues to stay active in the sector.

Bussmann is a graduate of the University of Nebraska-Lincoln. He is deeply involved in the local Las Vegas community through his involvement with UNLV, the Las Vegas Metro Chamber of Commerce, Clark County School District, the March of Dimes, and Nevada Childseekers.

KIT SZYBALA

Kit L. Szybala is a Partner and the Executive Director of Operations at GMA. Mr. Szybala oversees the output and quality of GMA's feasibility studies, due diligence assignments, strategic planning assessments, and market assessments.

While at GMA, Kit has created over 150 robust financial models in various markets globally. As a part of completing these financial models, he has evaluated over 300 casinos and integrated resorts. Mr. Szybala has written a multitude of extensive, analytical reports, including feasibility studies, impact and cannibalization studies, gaming market assessments, hotel market assessments, non-gaming amenity analyses, and strategic planning assessments.

Kit has in-depth experience in various markets with broad knowledge of markets in the United States, Canada, India, Japan, and Australia. Recently, he completed a white paper entitled "Gaming in India: An Evaluation of the Market's Potential" and assisted in the completion of the white paper entitled "Japan Integrated Resorts."

Mr. Szybala is a visiting lecturer on casino feasibility analysis at the University of Nevada, Reno's School of Continuing Education. He is a periodic contributor to Global Gaming Business Magazine and Asia Gaming Brief and is often referenced for market insights in gaming industry articles. Kit frequently participates on panels and presents at industry conferences, seminars, and events, including ICE Totally Gaming and Sports Betting and Gaming India.

He began his career in hospitality working with Vail Resorts as a member of the Vail Resorts College Program. This program gave him valuable insight into hospitality management and operations by giving him various opportunities to meet with chief members of resort management. It also afforded him the opportunity to work in several different capacities for the corporation, giving him the opportunity to understand the intricacies of resort operations.

Kit graduated from Southern Methodist University as a Hunt Leadership Scholar with a B.B.A. in Finance, B.A. in International Studies – European Concentration, and minor in History.

ERIKA MEESKE RAFFERTY

Erika Meeske Rafferty is Vice President of Native American Gaming at Global Market Advisors. Erika leads GMA's diverse and evolving service offering to Native American Tribes and First Nations. Her in-depth understanding of the nuances and challenges that face Native American and First Nation communities provides a valuable asset, built on over a decade of gaming and hospitality consulting experience.

Mrs. Rafferty has completed over 250 projects, working with more than 75 different tribes, providing expert analysis at varying development stages. Her body of work and expertise spans an impressive collection of capabilities including:

- Gaming market assessments
- Casino, hotel, and resort feasibility studies
- Amenity analysis

- Highest and best use assessments
- Socio and economic impact studies
- Improvement of business operations
- Primary market research
- Player database and industry surveys
- Psychographic and database analyses

In addition to her efforts in the Native American Division, Mrs. Rafferty is highly skilled in primary market research and facilitates all aspects of the industry and database survey projects from questionnaire development and programming to survey administration and analysis. Through a collaborative process, Erika is able to provide clients the opportunity to gain a deeper understanding of their specific market preferences, habits, and trends to uncover valuable insights. Her continuing contributions to numerous international, national, regional, and property specific studies allows her to maintain a keen eye on emerging global and market-specific industry trends.

Erika's dedication and passion to the hospitality and gaming industry grew from an early age. She has had life-long exposure to the industry, having been raised in the hotel and resort business and has since spent her entire career working in these industries. By performing various operational roles in hospitality related sectors, she gained an enhanced knowledge of the various efficiencies that can be attained at a property and how departments must interact to become a cohesive operation.

Mrs. Rafferty's experience in resort management has resulted in a well-honed ability to think strategically and solve complex problems. Erika continues to produce tangible business solutions to owners, operators, resort investors, casinos, hotels, conference facilities, entertainment venues, spas, and restaurants.

Erika is a periodic contributor to Global Gaming Business Magazine and Tribal Government Gaming. She continues to be a featured speaker and panelist on relevant industry trends and topics at G2E Las Vegas and NIGA.

Mrs. Rafferty graduated from Southern Methodist University with a B.A. in Economics and a minor in International Studies.

EXHIBIT K

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Peer Review – Traffic Impact Study for the Redding Rancheria Project

Prepared by Linscott, Law & Greenspan, Engineers
Principal Authors: Keil Maberry and Zawwar Saiyed

June 17, 2019

Linscott, Law & Greenspan, Engineers (LLG) has been engaged by the Paskenta Band of Nomlaki Indians to provide our review comments on the Traffic Impact Study for Redding Rancheria, prepared by Kimley Horn, dated June 2018, which serves as the basis for the assessment of traffic impacts in the *Draft Environmental Impact Statement: Redding Rancheria Fee-to-Trust and Casino Project* (April, 2019). Attached hereto is a description of the qualifications of LLG and the authors of this report. This review focuses on the proposed Project or Alternative A, as it would generate the largest amount of traffic. The Project consists of development of an approximately 69,515 SF casino, 250-room hotel, an event/convention center and a retail center. The Project site, also referred to as the Strawberry Field Site, is generally located in the southwest corner of the I-5 Freeway and South Bonnyview Road. The following summarizes our comments on the traffic study.

T6-101.1

General Comments

- It is generally accepted that a traffic impact analysis for a large project would assess typical weekday AM and PM peak periods in addition to the anticipated peak times for the project itself. Additionally, weekday traffic counts for the analysis would normally be taken on a Tuesday, Wednesday or Thursday when schools are in session, unless there are extraordinary circumstances. The Redding Rancheria TIA collected intersection turning movement counts during the Friday and Saturday PM Peak Period (5:00 PM – 7:00 PM). In addition, the counts were collected in July 2016, which is non-typical considering schools were not in session. Additional counts were collected in September 2016 and the TIA states that adjustments were applied to the July 2016 turning movement counts to proportionally increase volumes to reflect observed seasonal variation, but did not document these adjustments. According to City of Redding Guidelines, turning movement counts for the weekday morning and evening peak hours shall be collected from 7:00 a.m. to 9:00 a.m. and from 4:00 p.m. to 6:00 p.m., respectively, at 15-minute intervals, on a Tuesday, Wednesday or Thursday. Saturday mid-day counts shall be conducted from 11:00 a.m. to 1:00 p.m. at 15-minute intervals. Additional traffic counts for other time periods are required if the peak hour trips for the Project fall outside these time ranges. It is recommended that new traffic counts be collected when schools are in session to provide a conservative analyses and to be consistent with the City of Redding guidelines. The new traffic counts should be collected during a weekday AM

T6-101.2

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Jack M. Greenspan, PE (Ret.)
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Peak Period (7:00 AM – 9:00 AM) and PM Peak Period (4:00 PM – 6:00 PM), as well as a Saturday Midday Peak Period (11:00 AM – 1:00 PM). In addition, Saturday PM Peak Period (4:00 PM – 7:00 PM) traffic counts should be collected to validate that the Saturday PM Peak Hour volumes evaluated in the TIA fall within the 5:00 PM – 7:00 PM Period, since several locations have peak hours starting at 5:00 PM and the peak hour could potentially be earlier.

The City of Redding Traffic Impact Analysis Guidelines state:

- *"Traffic Counts - Turning movement counts for the weekday morning and evening peak hours shall be collected from 7:00 a.m. to 9:00 a.m. and from 4:00 p.m. to 6:00 p.m., respectively, at 15-minute intervals. Saturday mid-day counts shall be conducted from 11:00 a.m. to 1:00 p.m. at 15-minute intervals. Traffic counts for other time periods will be required if the peak hour trips for the project fall outside these time ranges, for example, schools, theaters, and churches."*
- *"Weekday average vehicle counts should be conducted on Tuesdays, Wednesdays, and Thursdays in dry weather conditions."*
- *"Data shall not be collected during holidays, days immediately before or after holidays, or during the last two weeks in December. Data should not be collected at times when spring break or summer break could significantly alter the data."*
- *"Historical traffic counts may not be used if more than two years old."*

T6-101.2 (Cont.)

- Review of the intersection count sheets provided in *Appendix A* indicate that truck classification counts weren't accounted for in order to determine existing truck percentage. Furthermore, review of the Synchro worksheets show that the HCM default of 2% Heavy vehicles was used. According to the *City of Redding Traffic Impact Analysis Guidelines*, actual existing percent heavy vehicles should be utilized on State facilities, otherwise 2% can be assumed. It is recommended that the existing truck percentage be utilized in the intersection level of service calculations, since most intersections fall within the SR-273 corridor and are freeway ramp intersections.

T6-101.3

- The Redding Rancheria TIA does not include Weekday AM Peak Hour analyses per the *City of Redding Traffic Impact Analysis Guidelines*. It is recommended to conduct analyses for the Weekday AM Peak Hour using counts conducted on either Tuesday, Wednesday or Thursday in dry weather conditions during the peak hours between 7:00 AM to 9:00 AM, at 15-minute intervals, as stated in the *City of Redding Traffic Impact Analysis Guidelines*.

T6-101.4

- The Weekday PM Peak Hour analyses in The Redding Rancheria TIA are inconsistent per the *City of Redding Traffic Impact Analysis Guidelines*, since all the traffic counts and analyses were conducted for a Friday. It is recommended to conduct analyses for the Weekday PM Peak Hour using counts conducted on either Tuesday, Wednesday or Thursday in dry weather conditions during the peak hours between 4:00 PM to 6:00 PM, at 15-minute intervals, as stated in the *City of Redding Traffic Impact Analysis Guidelines*. T6-101.5

- The Saturday Midday Peak Hour analyses in The Redding Rancheria TIA are inconsistent per the *City of Redding Traffic Impact Analysis Guidelines*, since all the traffic counts and analyses were conducted for a Saturday PM Peak hour. It is recommended to conduct analyses for the Saturday Midday Peak Hour using counts in dry weather conditions during the peak hours between 11:00 AM to 1:00 PM, at 15-minute intervals, as stated in the *City of Redding Traffic Impact Analysis Guidelines*. T6-101.6

- It is recommended to conduct LOS calculations using the most current *Highway Capacity Manual 6th Edition (2016)*. The Redding Rancheria TIA used *Highway Capacity Manual 2010 (2016)*. T6-101.7

- According to the Redding Rancheria TIA, the Opening (Year 2025) traffic volumes for a portion of the study intersections were developed based on linearly interpolating between existing and Year 2040 traffic volumes from information contained in the *River Crossing Marketplace Specific Plan Traffic Impact Analysis Report* prepared by Omni-Means, A GHD Company, 2017. Generally, interpolation has lower volumes and is less conservative than manually developing Year 2025 volumes from ambient growth and assignment of cumulative projects in the area. Please provide a list of cumulative projects that were used and is representative of the Year 2025 volumes utilized, as well as the Year 2040 Model Post-Processing model plots and worksheets to validate the Year 2040 volumes utilized. Furthermore, it is unclear how the Year 2040 Saturday volumes were developed. It is recommended to manually develop Year 2025 volumes from ambient growth and assignment of cumulative projects in the area, to provide more conservative analyses. T6-101.8

- It is unclear how the Year 2040 Saturday volumes were developed. Please provide details with supporting documentation showing how the Year 2040 Saturday volumes were developed. T6-101.9

- It is recommended to conduct Existing With Project scenario analyses, as this was not included in the Redding Rancheria TIA. It is recommended that the Redding Rancheria TIA analyze a baseline (Existing) without and baseline T6-101.10

(Existing) with Project scenario. This analysis is the basis for the Project's direct impacts and mitigation, and looks at the impacts to the system as it currently exists. T6-101.10 (Cont.)

- Based on preliminary review of the Project Trip Generation and Assignment, it appears that there would be some locations beyond what was analyzed that exceed 50-trips, in some cases these locations have close to 200 peak hour Projects trips. The potential for significant traffic impacts at these following ten (10) additional locations should be evaluated: T6-101.11

    1. Market Street (SR-273) at Kenyon Drive
    2. Market Street (SR-273) at Breslauer Way
    3. Market Street (SR-273) at Buenaventura Boulevard
    4. I-5 Southbound Ramps at Knighton Road
    5. I-5 Northbound Ramps at Knighton Road
    6. Churn Creek Road/Pacheco Road at Knighton Road
    7. Market Street (SR-273) at Briggs Street
    8. Market Street (SR-273) at 3rd Street
    9. Market Street (SR-273) at Ox Yoke Road
    10. Market Street (SR-273) at Spring Gulch Road

- Intersection queuing and Freeway Off-ramp queuing was not conducted. It is recommended to conduct intersection and freeway off-ramp queuing analysis at locations where Project traffic causes queues to exceed the available storage length based on the estimated 95th percentile queue lengths. T6-101.12

- It is unclear whether actual percent trucks were utilized for the Roadway Segment and Freeway Analyses. If default values were utilized, it is recommended that the actual percent trucks from the counts be utilized instead, per City and Caltrans' Guidelines. T6-101.13

- How was the study area determined? Was it determined in conjunction with City staff or was a trip threshold utilized? T6-101.14

- It appears that the counts were collected in Year 2016. Based on the June 2018 submittal of the report, were the counts adjusted or grown by an ambient growth factor to baseline Year 2018 conditions? T6-101.15

- Please confirm if the Project Trip Generation is based on the peak hour of generator or the peak hour of the adjacent streets. T6-101.16

- Was a Traffic Impact Analysis (TIA) Scope of Work (SOW) prepared and submitted to the City of Redding for approval? If yes, please provide the TIA SOW for review.

T6-101.17

Specific Comments

1) Page 7, Paragraph 1 – It is recommended that the latest Highway Capacity Manual 6th Edition (2016) be utilized.

2) Page 17, Paragraph 2:
   a) Please add discussion about roadway segment counts. Based on Appendix A, it appears that roadway segment counts were collected in July 2016. Please confirm if these counts were utilized in this study and adjusted, consistent with the adjustments made with the intersection counts.

   b) Please provide documentation and/or justification of only analyzing the Friday PM and Saturday PM Peak Period, from 5:00 PM to 7:00 PM. Consistent with Redding TIA Guidelines, it is recommended that a typical Weekday AM (7:00 AM – 9:00 AM) and PM (4:00 PM – 6:00 PM) Peak Periods, as well as Saturday Midday (11:00 AM – 1:00 PM) Peak Period be analyzed.

   c) Please provide documentation of the adjustments applied to the July 2016 traffic counts.

T6-101.18

   d) Please provide justification as to why truck classification counts weren't conducted and Passenger Car Equivalent (PCE) factors weren't utilized. There are truck uses within the vicinity of the Project site.

3) Page 18, Paragraph 1 – Please add discussion about the existing Amtrak Service and the railroad tracks adjacent to Market Street within the vicinity of the Project site.

4) Page 19, Figure 4:
   a) For Intersection #1 SR-273 (Market Street) at Cedar Road/ South Bonnyview Road, it appears the Figure accurately depicts existing intersection geometrics. However, review of the LOS calculation worksheets in the Appendices indicate that the eastbound direction was inaccurately coded as 1 left-turn lane, 2 through lanes and 1 right-turn lane. Please revise and update analysis accordingly to show 1 left-turn lane, 1 shared left-through lane, 1 through lane and 1 right-turn lane for the eastbound direction at Intersection #1 SR-273 (Market Street) at Cedar Road/ South Bonnyview Road.

b) For Intersection #4 I-5 SB Ramps at South Bonnyview Road, it appears the Figure accurately depicts existing intersection geometrics. However, review of the LOS calculation worksheets in the Appendices indicate that the southbound direction was inaccurately coded as 1 shared left-through lane and 1 right-turn lane. Please revise and update analysis accordingly to show 1 shared left-through-right lane and 1 right-turn lane for the southbound direction at Intersection #4 I-5 SB Ramps at South Bonnyview Road.

c) For Intersection #7 Alrose Lane at Churn Creek Road, it appears the Figure and the LOS calculation worksheets inaccurately depict existing intersection geometrics. Please revise and update analysis accordingly to show 1 shared left-through-right turn lane for the northbound direction, 1 shared left-through lane and 1 right-turn lane for the southbound direction, 1 left-turn lane and 1 shared through-right turn lane for the eastbound direction, and 1 shared left-through lane and 1 shared through-right turn lane for the westbound direction.

5) Page 20, Figure 5:

a) For Intersection #19 I-5 Southbound Off-Ramp at North Street, it appears the Figure inaccurately depicts existing intersection control as a "one-way stop". Review of Google Earth indicates that this intersection is an "all-way stop" controlled intersection. Please revise and update the Figure accordingly.

T6-101.18 (Cont.)

b) For Intersection #20 McMurray Drive/I-5 NB On-Ramp at North Street, it appears the Figure accurately depicts existing intersection geometrics. However, review of the LOS calculation worksheets in the Appendices indicate that the northbound and westbound directions were inaccurately coded. Please revise and update analysis accordingly to show 1 shared left-through lane and 1 right-turn lane for the northbound direction and 1 left-turn lane, 2 through lanes and 1 right-turn lane for the westbound direction at Intersection #20 McMurray Drive/I-5 NB On-Ramp at North Street.

c) For Intersection #21 Oak Street at Balls Ferry Road, please update the Figure to show stop-control in the northbound direction. In addition, review of the LOS calculation worksheets in the Appendices indicate that the Southbound movements were inaccurately coded. Please revise and update analysis accordingly to show a shared left-through-right turn lane.

6) Page 21, Figure 6:
   a) For Intersection #13 SR-273 (Market Street) at Westside Road/Girvan Road, it appears the Figure and the LOS calculation worksheets inaccurately depict existing intersection geometrics. Please revise and update analysis accordingly to show 1 left-turn lane and 1 shared left-through-right turn lane for the westbound direction.

   b) For Intersection #16 SR-273 (Market Street) at Happy Valley Road, it appears the Figure and the LOS calculation worksheets inaccurately depict existing intersection geometrics. Please revise and update analysis accordingly to show 1 left-turn lane and 1 right-turn lane for the eastbound direction.

7) Page 25, Table 6 – According to Section 4.4 of the Redding TIA Guidelines and Figure 2-1 Peak Hour Level of Service of the City of Redding 2000-2020 General Plan, the minimum acceptable LOS for the intersections of South Bonnyview Road at East Bonnyview Road, Bechelli Lane, and Church Creek Road (i.e. Intersections #2, #3 and #6) should be **LOS C**. Please provide justification and/or documentation otherwise.

8) Page 28, Paragraph 5 – Please provide existing signal warrant worksheets in Appendix C. It appears only Year 2025 and Year 2040 signal warrant worksheets were provided.

T6-101.18 (Cont.)

9) Page 29, Table 7 – Please update "Church Creek Rd west of Alrose Ln" to "Church Creek Rd east of Alrose Ln". Please update subsequent tables accordingly, if applicable.

10) Page 30, Table 8 – Please update the Peak-Hour Column to show "FRI" and "SAT", as opposed to "AM" and "PM". Please update subsequent tables accordingly, if applicable.

11) Page 33, Paragraph 2 – Are the Opening Year 2025 volumes taken from the River Crossing TIA representative of the most recent list of cumulative projects in the area? Please provide list of cumulative projects.

12) Page 41, Paragraph 2 – Please explain why Intersection #4 Bonnyview Road at I-5 SB Ramps and Intersection #6 Bonnyview Road at Churn Creek Road are significantly impacted in Opening Year (2025) traffic conditions, but not impacted in Cumulative (2040) traffic conditions.

13) Page 42, Table 11 – Please explain why VISSIM wasn't utilized for Existing and Opening Year (2025) traffic conditions.

14) Page 48, Table 15 – Please explain why Opening Year (2025) levels of service are generally worse when compared to Cumulative (2040) levels of service.

15) Page 49, Paragraph 2 - For the new I-5 Interchange at Smith Road Option (Option 3), was there any potential shift in baseline traffic volumes accounted for resulting in this new interchange? (i.e. shift in some traffic utilizing I-5 Interchange at Bonnyview Road)? If so, please provide details and backup materials.

16) Page 50, Paragraph 1 – Please provide documentation that supports the identification that Friday and Saturday PM peak periods represent the worst-case periods.

17) Page 51, Table 16:
   a) Please provide documentation or source of the derived rates utilized for the Casino.

   b) Please provide documentation for the "average auto occupancy of 2.2 people per vehicle" utilized.

   c) Please show the calculated Daily rates in the notes below Table 16.

T6-101.18 (Cont.)

18) Page 63, Figure 17 – Based on preliminary review of the Project Trip Generation and Assignment, it appears that there would be some locations beyond what was analyzed that exceed 50-trips, in some cases these locations have close to 200 peak hour Projects trips. The potentially significant traffic impacts at these following ten (10) additional locations should be analyzed.

   1) Market Street (SR-273) at Kenyon Drive
   2) Market Street (SR-273) at Breslauer Way
   3) Market Street (SR-273) at Buenaventura Boulevard
   4) I-5 Southbound Ramps at Knighton Road
   5) I-5 Northbound Ramps at Knighton Road
   6) Churn Creek Road/Pacheco Road at Knighton Road
   7) Market Street (SR-273) at Briggs Street
   8) Market Street (SR-273) at 3rd Street
   9) Market Street (SR-273) at Ox Yoke Road
   10) Market Street (SR-273) at Spring Gulch Road

19) Page 69, Table 20 – Please identify if the "Weekday PM Peak Hour" is Thursday or Friday.

20) Page 139, Paragraph 1 – It is recommended to develop conceptual improvement plans to determine feasibility of the proposed mitigation measures.

21) Page 139, Paragraph 2 – Please provide fair share calculations as a Table or Appendices.

LLG Analyses & Comparison to KH Study

22) LLG collected intersection turning movement counts with truck classifications at all twenty-three (23) intersections analyzed in the Kimley-Horn study on Thursday, May 16th, 2019, during the AM peak period (7:00 AM – 9:00 AM) and PM peak period (4:00 PM – 7:00 PM). For 7 of the 23 intersections (i.e. Intersections #1 through #7), counts were also collected on Saturday, May 18th, 2019, during the Midday peak period (11:00 AM – 1:00PM) and PM peak period (4:00 PM – 7:00 PM). Furthermore, counts were collected for the ten (10) additional locations identified in Comment #18 above, during the Thursday AM and PM peak periods, as well as the Saturday PM peak period. It should be noted that schools were still in session while the counts were being collected.

T6-101.18 (Cont.)

23) Based on preliminary review of Kimley-Horn's Existing (Year 2016) Intersection level of service calculations, the following provides a brief summary of our initial findings:

- Synchro 9 Software and HCM 2010 was utilized.
- Peak Hour Factor (PHF) of 0.92 was utilized.
- Heavy Vehicle Percentage (%) of 2% was utilized, which is the default per HCM.
- Based on City of Redding guidelines, the worst-case movement LOS should be reported for two-way stop controlled intersections. It appears that some intersections do not show the correct LOS in *Table 6* of the Kimley-Horn TIA Report (i.e. Intersection #7).

24) LLG prepared Existing baseline (Year 2019) intersection level of service (LOS) calculations for the twenty-three (23) intersections Kimley-Horn analyzed, as well as the ten (10) additional intersections as identified in Comment #18. The following provides a brief summary of the universal inputs assumed in the intersection LOS calculations:

- Vistro 7.0 Software and HCM 6th Edition was utilized.

- Peak Hour Factors from existing counts were utilized.
- Heavy Vehicle Percentages were based on the existing truck percentages from the counts.
- Base Saturation Flow Rate of 1,710 vehicles per hour per lane (vphpl) was utilized for exclusive left-turn lanes and 1,900 vphpl was utilized for all other lanes. .
- Intersection Lost Time was based on HCM (16 seconds for 8-phase and 6-phase signals, 12 seconds for 5-phase and 3-phase signals, and 8 seconds for 2-phase signals)..
- The worst-case movement LOS for TWSC intersections was reported, per City of Redding Guidelines.

25) *T*he following five (5) intersections are currently operating at adverse service levels during the Weekday (Thursday) AM or PM peak hour:

- Intersection #6: Churn Creek Road at S Bonnyview Road
- Intersection #7: Alrose Lane at Churn Creek Road
- Intersection #8: Victor Avenue at Churn Creek Road
- Intersection #9: Rancho Road at Churn Creek Road
- Intersection #18: Oak Street at North Street

T6-101.18 (Cont.)

26) The following intersections have the potential to operate at adverse service levels and/or be locations where the proposed Project may cause a significant impact due to the levels of service being close to exceeding the minimum acceptable LOS:

- Intersection #2: E Bonnyview Road at S Bonnyview Road
- Intersection #3: Bechelli Lane at S Bonnyview Road
- Intersection #27: I-5 SB Ramps at Knighton Road
- Intersection #32: Market Street (SR-273) at Ox Yoke Road

It should be noted that the intersections of I-5 SB Ramps at Knighton Road (#27) and Market Street (SR-273) at Ox Yoke Road (#32) were not analyzed in the KH Study and these intersections have the potential to be significantly impacted with the proposed Project.

27) Under future traffic conditions (i.e. Year 2025 and Year 2040), the following intersections may operate at adverse service levels and/or be locations where the

proposed Project may cause a significant impact due to the levels of service being close to exceeding the minimum acceptable LOS:

- Intersection #6: Churn Creek Road at S Bonnyview Road
- Intersection #7: Alrose Lane at Churn Creek Road

28) A comparison between the Existing (Year 2019) intersection LOS analysis prepared by LLG and the Existing (Year 2016) intersection LOS analysis prepared by Kimley-Horn was conducted. It should be noted that Kimley-Horn's study did not analyze a Weekday AM Peak Hour traffic condition or a Saturday Midday Peak Hour traffic condition. In general, LLG's Existing (Year 2019) intersection delay/LOS is higher (worse) when compared to Kimley-Horn's Existing (Year 2016) analysis.

29) It should be noted that according to the City of Redding TIA Guidelines, City of Redding General Plan and the Shasta County Circulation Element, the following intersections should have been assessed utilizing the minimum acceptable LOS C:

- Intersection #2: E Bonnyview Road at S Bonnyview Road
- Intersection #3: Bechelli Lane at S Bonnyview Road
- Intersection #6: Churn Creek Road at S Bonnyview Road
- Intersection #29: Churn Creek Road/Pacheco Road at Knighton Road

T6-101.18 (Cont.)

The Kimley-Horn TIA Report analyzed these four (4) intersections utilizing the minimum acceptable LOS D.

<u>This minimum acceptable LOS discrepancy should be verified with the City of Redding and Shasta County.</u>

30) In addition, a comparison between the LLG's Existing (Year 2019) and Kimley-Horn's Existing (Year 2016) intersection total volume was conducted. It should be noted that since Kimley-Horn's traffic study only analyzed a Friday PM Peak Hour and Saturday PM Peak Hour, the Weekday (Thursday) PM Peak Hour volumes prepared by LLG for the twenty-three (23) intersections were compared to the Friday PM Peak Hour volumes prepared by Kimley-Horn. Since LLG only collected Saturday counts at 7 of the 23 intersections (i.e. Intersections #1 through #7), the Saturday PM counts at these 7 locations were compared to Kimley-Horn's Saturday PM counts. LLG's Thursday PM Peak Hour total intersection volumes are generally higher than Kimley-Horn's Friday PM Peak Hour volumes (with a range of between 1% to 18% higher).

LINSCOTT LAW & GREENSPAN engineers

LLG's Saturday PM Peak hour total intersection volumes are generally lower than Kimley-Horn's Saturday PM Peak Hour volumes.

31) Based on preliminary review of the daily roadway segment counts from *Appendix A* of the Kimley-Horn Report, it appears that these daily traffic counts were not utilized in the Roadway Segment levels of service calculations, as peak-hour volumes from adjacent intersections were utilized instead. However, since LLG collected daily roadway segment counts on a Thursday and Saturday in May 2019, a comparison to the daily roadway segment counts presented in the Kimley-Horn Report appendices that were collected in July/September 2016 was prepared. LLG's Thursday daily roadway segment volumes are generally higher (with a range of between 5% to 32% higher) than Kimley-Horn's Friday daily roadway segment volumes.

* * * * * * * * * * *

LLG Background

T6-101.18 (Cont.)

Linscott, Law & Greenspan, Engineers (LLG), provides transportation planning, traffic engineering and parking consulting services to public agencies and the private sector. LLG is a well-respected firm of medium size, comprised of over fifty dedicated professionals, many with Professional Registration in Traffic Engineering, Civil Engineering, or both. LLG offices located in Woodland Hills, Pasadena, Irvine, and San Diego serve their clients on a wide variety of complex issues. Since our founding in 1966, in excess of 10,000 engagements have been completed involving a wide variety of projects throughout the United States and Overseas, with the core of our practice in Southern California. LLG's specialties include:

- Traffic Studies for Environmental Documents
- Traffic Impact Studies
- SB 743/VMT Analyses
- Site Access and Circulation
- Multimodal Analysis
- Traffic Planning, Operations, and Simulation Studies
- Circulation Elements for General Plans and Specific Plans
- Preliminary/Conceptual Engineering
- Traffic Signal Design
- Traffic Signing and Striping Design
- Traffic Signal Warrant Studies

- Construction Zone Traffic Control Plans
- Shared Parking Demand Forecasting
- Parking Design and Planning
- Complete Streets Consultation

Keil Maberry, P.E., Principal

Mr. Keil D. Maberry has over 25 years of experience in the preparation of transportation planning analysis, traffic impact studies and parking studies. He is a licensed Traffic Engineer in the state of California. Mr. Maberry holds a Bachelor of Science in Civil Engineering from the University of Maryland. He has extensive experience in the preparation of traffic impact studies for a variety of land uses, site access and operational plans, simulation studies, parking studies, traffic and parking management plans, school operational plans and suggested route to school plans. In addition, Mr. Maberry has provided on-call traffic and transportation engineering consultation services to the City of Corona, City of Irvine and the City of Dana Point.

T6-101.18
(Cont.)

Zawwar Saiyed, P.E., Senior Transportation Engineer

Zawwar Saiyed is a licensed Traffic Engineer in the state of California. He earned his Masters of Science in Civil Engineering from the University of Arizona, Tucson and has over 16 years of experience working on traffic engineering projects throughout the Southern California region. Mr. Saiyed has extensive experience in the preparation of traffic impact studies for a variety of land uses, site access and operational plans, parking studies, parking management plans, and experienced in utilizing Highway Capacity Software, TRAFFIX, Vistro and Synchro. His expertise in traffic engineering helps LLG continue its tradition of excellence in the region.

* * * * * * * * * * *

We appreciate the opportunity to provide this report.

Comment Letter T7

Nor Rel Muk Wintu Nation
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(530) 410-1125
E-mail: NRMWintu@gmail.com

June 17, 2019

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

Re: DEIS Comments, Redding Rancheria Fee-to-Trust and Casino Project

Dear Mr. Broussard:

On behalf of the Nor Rel Muk Wintu Nation ("Nation"), I submit the following comments on the Redding Rancheria Fee-to-Trust and Casino Project Draft Environmental Impact Statement (DEIS). The Nation is descended from the historic Wintun speaking peoples of the Sacramento Valley with significant historical and cultural connections to the proposed casino project site known as "Strawberry Fields".

The National Historic Preservation Act (NHPA) requires a federal agency to take into account any adverse effects on historical or culturally significant sites before taking action that might harm such sites. The DEIS is clear that historic archaeological resources have been found in the Area of Potential Effects (APE) encompassing the Strawberry Fields Site and Off-Site Access Improvement Area. The DEIS at page 4.6-2, identifies an historic Wintu village CA-SHA-266, known as *Yonotümnomsono*, within the North Access Improvement Area. The DEIS recognizes that this site is eligible for listing in the National Register of Historic Places (NRHP) and that the project "will adversely affect" it. The *Yonotümnomsono* site is only one of at least six historical Wintu villages located in the area that extend south through the Strawberry Fields site. However, the DEIS does not propose any Phase III pre-construction mitigation for the *Yonotümnomsono* or additional investigation to determine NRHP eligibility for the remaining sites. In lieu of implementing a preemptive mitigation strategy, the DEIS proposes a "wait and see" approach that relies entirely on untrained construction worker awareness to identify archaeological resources or burial remains

T7-01

during excavation activities. The Nation finds the mitigation strategy inadequate and lacking minimum protections for its historical and cultural resources.

T7-01 (Cont.)

In addition, Section 106 of the NHPA compels federal agencies to engage in consultation with the State Historic Preservation Office (SHPO), Advisory Council on Historic Properties (ACHP) and potentially affected Tribes to determine whether historic properties or traditional cultural properties exist in the APEs. The DEIS shows that there has been no attempt to consult with the SHPO or ACHP. The DEIS also explains that in April of 2016 a Phase II Testing and Evaluation investigation was completed on the Strawberry Fields site that did not include the Nation. *See* DEIS pg. 3.6-5, 3.6-6; DEIS Appendix E – Cultural Resources Consultation. While prehistoric artifacts and archaeological evidence were recovered demonstrating the site was occupied from at least 750 A.D., Redding Rancheria monitors inaccurately determined the site had no cultural significance. *See* DEIS pg. 3.6-6.

T7-02

The Strawberry Fields Site and adjacent lands and waters constitute the indigenous territory of the Wintu people and are historically and culturally significant to the Nation. For the reasons stated above, the Nation finds the proposed mitigation measures inadequate and the consultation process in violation of the minimum standards of the NHPA.

T7-03

The Nation also hereby incorporates, by reference, the comments of the Paskenta Band of Nomlaki Indians on the DEIS, in particular, those addressing Cultural Resources.

Sincerely,

John Hayward

Johan Hayward
Chairman
Nor Rel Muk Wintu Nation

Comment Letter T7



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Comment Letter I1

From: Sean Beam <sb99an7@gmail.com>
Date: Mon, May 20, 2019 at 5:24 PM
Subject: [EXTERNAL] "Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project"
To: <chad.broussard@bia.gov>

Please submit attached letter as public comments.

I1-01

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October 8, 2015

Via U.S. Certified Mail 70132630000236582440
Kevin Washburn
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U.S. Department of the Interior
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Re: Redding Rancheria Fee-to-Trust Application

Dear Assistant Secretary Washburn, Pacific Regional Director Dutschke and Superintendent Akins:

This office represents Joseph La Perle, a Tribal member of the Redding Rancheria ("Tribe") who has been denied the rights and benefits of his Tribal membership in violation of the Tribe's Constitution and the Indian Civil Rights Act of 1968, 25 U.S.C. §§ 1301, *et seq.* ("ICRA"). As a result of Mr. La Perle and other Tribal members' disenfranchisement, the Bureau of Indian Affairs ("BIA") cannot lawfully recognize any action taken by the currently-installed governing body of the Tribe. For this reason, I write to request that the BIA refuse to recognize any action taken by the Tribe's governing body, including its current fee-to-trust

I1-02

application, until it abides by the requirements of ICRA and honors Mr. La Perle's Tribal membership.

I1-02 (Cont.)

Joseph La Perle is a Tribal member.

Joseph La Perle is a lineal descendant of Katherine Stieber[1], an original distributee of the Redding Rancheria Distribution Plan dated October 8, 1959 adopted pursuant to the California Rancheria Act of 1958. The other lineal descendants of Ms. Stieber include Josephine Fisher, Vernon La Perle, Katherine Osman, James La Perle, Crystal Galiher, Anthony Ross, James Ross, Peter McCollough, Alicia La Perle, Kolden Galiher, Sophia La Perle, Conner La Perle, Jacob Hutchinson, Issac Galiher, and Gabriel Ross (collectively, the "Stieber Lineal Descendants").

Joseph La Perle and the Stieber Lineal Descendants are Regular Members of the Redding Rancheria pursuant to the Constitution of the Redding Rancheria ("Constitution") and the Redding Rancheria Enrollment Procedures Act of 1997 ("Enrollment Ordinance"). The Constitution defines the "Regular Membership" as "[t]he membership of the Redding Rancheria *shall consist of*...All lineal descendants of the seventeen (17) original distributees listed on the plan of distribution of the Redding Rancheria, dated October 8th, 1959." Constitution, Art. II § 1.b (emphasis added). The Enrollment Ordinance also provides the "Regular Membership" of the Tribe consists of "[a]ll lineal descendants of the seventeen (17) original distributees list on the plan[] of distribution of the Redding Rancheria, dated October 8, 1959." Redding Rancheria Enrollment Procedures Act of 1997 ("Enrollment Ordinance"), at 1.

Significantly, the Tribe's Constitution differentiates between those persons who are automatic "Regular Members" with all other persons wishing to *enroll* and become *new* members in the Tribe. The former *automatically includes* as regular Tribal members all individuals who meet the definition of the "Regular Membership." The Constitution defines the later class as all other individuals who are *not* identified as Regular Members and wish to obtain membership in the Tribe:

I1-03

> 4. Adoption and Enrollment
>
> The process by which persons ***other than those identified in Article II, Clause I (a) and (b)*** are able to obtain membership in the Redding Rancheria.

Constitution, Definitions Section, § 4 (emphasis added).

The Constitution further provides the Tribal Council shall have the power to adopt an Adoption and Enrollment Ordinance governing the adoption of members and other issues related to *future membership*: "The Tribal Council shall have the power to make an Adoption and Enrollment Ordinance governing the adoption of persons of Indian blood and other issues related to future membership." Constitution, Art. II, § 2(a). Clearly, the Constitution differentiates

[1] *See*, http://www.redding-rancheria.com/tribal-elders.php (last visited September 25, 2015).

between automatic Regular Members with those persons who are not lineal descendants of the original distributees who desire to become *new members through an enrollment process.*

Accordingly, as a lineal descendant of one of the original distributees, Mr. La Perle and the Stieber Lineal Descendants satisfy the Tribe's Constitutional membership definition and therefore are Tribal Members.

The Tribe has denied Mr. La Perle and the Stieber Lineal Descendants the rights and benefits of their Tribal membership.

Despite their Tribal membership under the express provisions of the Tribe's Constitution, the Tribal Council asserted that Joseph La Perle and the Stieber Lineal Descendants were required to complete an enrollment process in order for their membership to be acknowledged. Pursuant to the Tribal Council's instructions, Joseph La Perle and the Stieber Lineal Descendants submitted enrollment applications in 2010.

The Tribal Council notified Joseph La Perle by letter dated June 7, 2011 that he was placed in a "pool" of applicants "eligible for membership." However, the Tribal Council advised that this does not entitle Mr. La Perle to participate in Tribal affairs nor receive any benefits and services provided to other Regular Members of the Tribe. Further, the Tribal Council advised that it will determine, on an annual basis, whether any persons listed in the "enrollment pool" shall be added to the membership roll. The Tribal Council erroneously placed Mr. La Perle and the Stieber Lineal Descendants in an enrollment pool in violation of the Constitution.

I1-03
(Cont.)

After Mr. La Perle and the Stieber Lineal Descendants were placed in an enrollment pool, the Tribal Council announced a new change in the enrollment process by letter dated September 8, 2015, advising it will review the enrollment pool every five years, instead of annually as required by the Enrollment Ordinance (discussed below), and determine whether any persons from the pool will be enrolled into the Tribe. This change in the enrollment process not only affects Mr. La Perle and the Stieber Lineal Descendants, but also the lineal descendants of Arthur Hayward, another original distributee of the plan for the distribution of the Redding Rancheria, dated October 8, 1959 (the "Hayward Lineal Descendants").[2] Since 2010, approximately twenty (20) new Tribal members were born, and approximately another 20 reached the age of eighteen, the majority of both minors and adults consisting of the Hayward Lineal Descendants. The Tribal Council has now disenfranchised two classes of lineal descendants from two original distributees by refusing to recognize their rights as Regular Members by placing them in an "enrollment pool."

The enrollment process of new Tribal members is specifically designated for persons who do not qualify as lineal descendants of the original distributees listed on the plan of distribution of the Redding Rancheria, dated October 8, 1959. The definitions section of the Constitution defines "Adoption and Enrollment" as "[t]he process by which persons *other than those identified in Article II, Clause I (a) and (b)* are able to obtain membership in the Redding

[2] *See*, Redding Rancheria Tribal Elders, FN 1, *supra.*

Rancheria." Constitution, Definitions. Article II, Clause I(b) of the Constitution defines the aforementioned class of "Regular Membership": "All lineal descendants of the seventeen (17) original distributees listed on the plan of distribution of the Redding Rancheria, dated October 8th, 1959."

The decision of the Tribal Council whether to allow Joseph La Perle and the other lineal descendants of Ms. Stieber to participate in Tribal affairs is not based on membership qualifications and Tribal law, but rather financial resources. The Enrollment Ordinance provides the Chief Financial Officer shall a report to the Tribal Council "[e]very year on or before September 1st", regarding the Tribe's fiscal status,

> together with the recommendation of the executive team as to whether funds are available for enrollment of one or more persons from the Enrollment Pool of Eligible Applicants...**Based on the report and recommendation . . . [the] Tribal Council shall determine in its sole discretion whether any applicants from the Enrollment Pool of Eligible Applicants shall be enrolled as members** of the Redding Rancheria the following year. If the Tribal Council determines that sufficient funds are available and finds it in the interest of the Tribe and its membership, the Tribal Council shall direct the enrollment committee whether to add any eligible Applicants to the membership roll of the Redding Rancheria...

Enrollment Ordinance, §§ 7 – 8. Thus, the Tribal Council must determine on an annual basis whether to admit new members into the Tribe. The Tribal Council's new enrollment process announced in 2015, changing enrollment determinations from one year to every five years, is in violation of the Enrollment Ordinance. No vote of the General Council took place to amend the Enrollment Ordinance reflecting this change.

I1-03
(Cont.)

By placing Joseph La Perle and the Stieber Lineal Descendants in an "enrollment pool," the Tribal Council of the Redding Rancheria has denied Joseph La Perle and the Stieber Lineal Descendants their ability to participate in Tribal elections and General Meetings in violation of Article VI, Section 8 of the Tribe's Constitution ("All members of the Redding Rancheria who are eighteen (18) years of age or older shall be qualified voters in elections and General Meetings."). Specifically, Joseph La Perle and the Stieber Lineal Descendants were precluded from voting in the Tribe's most recent Tribal Council election, which took place on October 3, 2015. The Tribal Council also has barred Joseph La Perle and the Stieber Lineal Descendants from attending and voting in any General Meetings for several years. Additionally, the Tribal Council has refused to make available to them the governmental benefits, programs and services that it provides to other Regular Members.

Moreover, the Tribal Council has treated some lineal descendants of Ms. Stieber differently than other lineal descendants. For example, the Tribal Council allowed Lydia La Perle, a lineal descendant and granddaughter of Katherine Stieber and the mother of Joseph La Perle, to participate in Tribal affairs, including the election of Tribal leadership, beginning in April 20, 2010. Notwithstanding Joseph La Perle's direct relation to Lydia La Perle, and the Stieber Lineal Descendants relation to Katherine Stieber, the Tribal Council has refused to allow

Joseph La Perle and the Stieber Lineal Descendants to participate in Tribal affairs and exercise their rights, including participating in the election of Tribal leadership, as Regular Members. Additionally, the Tribal Council has excluded the Hayward Lineal Descendants from participating in Tribal affairs.

The Tribal Council's denial of the rights and benefits of Tribal membership violates the Indian Civil Rights Act.

The Constitution has incorporated the ICRA, and bestows these rights to Tribal members: "The rights of the Redding Rancheria members are those which are guaranteed by the Indian Civil Rights Act of 1968." Constitution, Art. III. "The Tribal Council in exercising powers of self-government shall not . . . deny any person within its jurisdiction the equal protection of its laws or deprive any person of liberty or property without due process of law." Constitution, Art. III, § c.

Nothing in the Tribe's Constitution or other Tribal law provides for disenrollment of Tribal members. Further, the Tribe never purported to disenroll Joseph La Perle or the Stieber Lineal Descendants, but has rather treated them as non-members with no procedural or substantive Due Process. Such a deprivation of the rights and benefits of their Tribal membership constitutes a violation of ICRA's due process protections. *See* 25 U.S.C. § 1362(a)(8) (providing that Indian tribes may not "deprive any person of liberty or property without due process of law").

I1-03
(Cont.)

Furthermore, by treating some lineal descendants of Katherine Stieber differently from other lineal descendants of Ms. Stieber, the Tribal Council has denied Joseph La Perle and other lineal descendants the equal protection of Tribal law in violation of ICRA. *See* 25 U.S.C. § 1362(a)(8) (providing that Indian tribes may not "deny to any person within its jurisdiction the equal protection of its laws").

The Bureau of Indian Affairs may not recognize actions of a Tribe that are tainted by violations of ICRA.

The Secretary of the Interior and the Bureau of Indian Affairs ("BIA" or "Bureau") are charged with the duty to protect the rights of tribal members, and this duty extends to violations of these rights by other members of the tribe. *Seminole Nation of Oklahoma v. Norton*, 223 F.Supp.2d 122, 146 (D. Col. 2002). The Bureau may review alleged violations of ICRA when the Bureau has a "separate source of authority to act on a matter, the resolution of which implicates the alleged ICRA violation." *Hazard v. Eastern Regional Director*, 59 IBIA 322, 325 (2015). In this case, the Bureau has a separate authority to review any alleged violations of ICRA because of its authority under the Indian Land Consolidation Act, 25 U.S.C. §§ 2201, *et seq.*, to review and approve or decline a fee-to-trust application submitted by the current Tribal Council. It is well settled the Bureau has the authority and responsibility to decline to recognize any tribal actions that are tainted by violations of the ICRA. *Greendeer v. Minneapolis Area Director*, 22 IBIA 91, 97 (1992); *Norton*, 223 F.Supp.2d at 146.

Any action that disenfranchises a clearly defined eligible class of voters under a tribal constitution may violate the ICRA. *See*, *Crooks v. Area Director, Minneapolis Area Office*, 14 IBIA 181, 184 (1986) ("Where a tribal constitution defines a class of eligible voters, as does the community's constitution, and does not specifically authorize the tribe's governing body to legislate regarding qualification of voters, as the community's constitution does not, the validity of a tribal ordinance which disenfranchises members who fall within the constitutional class of voters is questionable. Such an ordinance is potentially violative of both the tribal constitution and the Indian Civil Rights Act of 1968, 25 U.S.C. § 1302 (1982)." (footnote omitted). Here, the Tribe's Constitution and Enrollment Ordinance clearly defines the Regular Membership of the Redding Rancheria as lineal descendants of the distributees the plan of distribution of the Redding Rancheria, dated October 8th, 1959. As Regular Members, they have right to due process and the equal protection of Tribal law. *See*, Constitution, Art. III ("Rights of Members").

I1-03 (Cont.)

In addition, in discharging its government-to-government relationship with an Indian tribe, the BIA has the authority and the responsibility to decline to recognize the results of a tribal election when it finds that a violation of ICRA has tainted the election results. *United Keetoowah Band of Cherokee Indians In Oklahoma v. Muskogee Area Director*, 22 IBIA 75, 83 (1992). Denying Tribal members of their Constitutionally-guaranteed right to vote constitutes an ICRA violation. Furthermore, "failure to provide proper notice may well constitute a violation of the due process rights of tribal members under ICRA." *Naylor v. Sacramento Area Director*, 24 IBIA 76, 82 (1992). As discussed above, Joseph La Perle and the Stieber Lineal Descendants were not provided proper notice of the most recent Tribal Council election and were denied the right to vote in that election. Thus, because the last Tribal Council election was tainted by ICRA violations, the Bureau has the responsibility to decline to recognize that election, the resulting Tribal Council, and any action taken by the Tribal Council elected in the most recent Tribal election.

Thus, any action taken by the Tribal Council in violation of the ICRA is *void ab initio*. We object to any action taken by the Tribal Council that violates the ICRA. Specifically, we object to the action of the Tribal Council of submitting the fee-to-trust ("FTT") application that is currently before Assistant Secretary Washburn's office. The FTT application consists of approximately 151.89 acres (referred to as "Strawberry Fields") located 1.6 miles from the Redding Rancheria near Redding, California within the unincorporated part of Shasta County and an additional 80 acres located directly south of the Strawberry Fields.

I1-04

The action of the Tribal Council in submitting the FTT application was tainted by a violation of the ICRA, as the Council deprived Tribal members Joseph La Perle and the Stieber Lineal Descendants of their rights under the Constitution and guaranteed by ICRA by excluding them from participating in the election, and the approval and submission of the application. Moreover, the Tribal Council has violated their rights under ICRA to the equal protection of Tribal laws by treating some lineal descendants of Ms. Stieber differently from other lineal descendants.

For these reasons, we respectfully request that the Assistant Secretary decline to approve the FTT application, as well as any other application or request by the Tribe's current Tribal Council, until the Tribe abides by the requirements of ICRA and honors the Tribal membership of Joseph La Perle and the Stieber Lineal Descendants.

I1-04 (Cont.)

Thank you in advance for your attention to this request. We respectfully request a meeting with you and Joseph La Perle at your earliest convenience regarding this matter.

I1-05

Sincerely,

FREDERICKS PEEBLES & MORGAN LLP

John M. Peebles

JMP:smb

Comment Letter I2

Reg Dir ael
Dep RD Trust
Dep RD IS
Route Decrms Chad. B.
Response Required
Due Date
Memo Ltr Jim Morrow
Fax P.O. Box 720480
Redding, Ca 96099
May 16, 2019

2019 MAY 17 PM 2:41

Amy Dutschke Regional Director
Bureau of Indian Affairs Pacific Region
2800 Cottage Way
Sacramento, CA 96001

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

Re: Request for 120 Day Extension of Time to File DEIS Comments on the Redding Rancheria Fee-To-Trust and Casino Project

Dear Ms. Dutschke and Mr. Broussard:

I, Jim Morrow, am in receipt of the "Notice of Availability of a Draft Environmental Impact Statement for the Redding Rancheria Fee-to-Trust and Casino Project, Shasta County." I have downloaded and printed the Draft Environmental Impact Statement ("DEIS") and Appendices A through K.

The DEIS is 609 pages and the Appendices amount to over 5,000 pages. The Traffic Study (Appendix K) is just shy of 2,000 pages.

I intend to file detailed comments on the DEIS.

I2-01

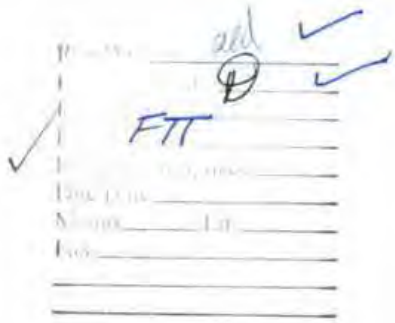
I respectfully ask that you provide an additional 120 days, until October 2, 2019, to provide you with comments. This extension should similarly be given to members of the general public who intend to submit comments. Given the short notice, I likewise request that you extend the date of the public hearing to September 20, 2019.

Given the magnitude of the materials to study and digest in order to fairly provide meaningful comments, I respectfully believe that these are modest requests.

Thank you very much for your consideration.

Sincerely,

Jim Morrow
Adjoining property owner to Strawberry Fields



569 Rivella Vista Drive

Redding, CA 96001

May 17, 2019

Amy Dutschke, Regional Director

Bureau of Indian Affairs

Pacific Region

2800 Cottage Way

Sacramento, CA 95825

Dear Ms. Dutschke:

My husband and I are writing you to let you know that we object to the building of a casino by Win River in the Churn Creek Bottom due to environmental reasons: flood control, air, water, noise and light pollution as well as traffic congestion and emission.

Win River will be placing their casino in a Sacramento River bottom that is known for its agricultural superiority of top soil. This precious land should not be covered in concrete. It should remain as a buffer to the city of Redding.

I3-01

We urge you to deny it being built in this location.

Sincerely,

Buck and Sue Lang

Dear Tara

We are also very concerned of the potential adverse effects to specific species of wild life and the elimination of native plants.

Sincerely, Sue C. Lang

I3-02

WRITTEN COMMENT CARD

BUREAU OF INDIAN AFFAIRS – PUBLIC HEARING MEETING
REDDING RANCHERIA FEE-TO-TRUST AND CASINO PROJECT

REDDING MEMORIAL VETERANS HALL – REDDING, CALIFORNIA
MAY 20, 2019

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WRITTEN COMMENTS ON THE DRAFT EIS MUST ARRIVE BY JUNE 17, 2019.

(Please print legibly)

Name: Alan Hall Organization: _____

Address: 8057 Churn Cr Rd Redding CA 96002

Comment:

We are opposed to the Casino project for the following reasons

1) The Casino already exists on 273 – already a high crime area
2) The location at entrance to Redding on I-5 is wrong
3) Bad project in Bad location will create more crime
4) Don't believe the tax free gift is appropriate
5) We don't need or want it. Go to 273, Rolling Hills Orouville, Burney, Reds etc!! Not here

I4-01

Please give to attendant, drop in Written Comment Box, mail to Bureau of Indian Affairs, Attention: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way Room W-2820, Sacramento, CA 95825, or email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use "Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project" as the subject of your email.

WRITTEN COMMENT CARD

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(Please print legibly)

Name: AMBAR MOHAMMED Organization: CNIGA.

Address: [redacted]

Comment: WE/A SUPPORT REDDING RANCHERIA

I5-01

Please give to attendant, drop in Written Comment Box, mail to Bureau of Indian Affairs, Attention: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way Room W-2820, Sacramento, CA 95825, or email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use "Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project" as the subject of your email.

May 20, 2019

To Whom it May Concern,

I am writing to you in regards to the Redding Rancheria's plans to build their new Casino Off highway 5.

I have lived here for 20 years. I have seen Many Businesses come and go, and with that more unemployment in the County. There is not much for Our "Youth" after graduating and going on to College, to want to come back to live and work here. We have NO manufacturing jobs here, or Big companies that would entice our Graduates to stay. There is Medical and Retail. With the many retail Businesses that have closed in the recent months, too many empty Buildings that will be eyesores for many years to come. We have many Doctor's that are either retiring or going elsewhere. Leaving many in the Medical profession without jobs.

I have worked in the hospitality Business for over 40 years. In the Bay Area and now here. I worked in one of top 10 RV Parks here in Redding. I am now the executive Director of the Shasta Lake Chamber of Commerce. I see many Tourist's and guide them to some of our Many "sights" that we have in the North State. I also get many calls from out of state visitors, that want information of what to do, and where to stay. Our Chamber sends many "Packets" of fliers and Brochures of our area, and what to do and where to stay. I6-01

As I see it, we are a Destination area for our beautiful Lakes, hiking and recreational activities. One of those Destinations could be the New casino and how it could benefit this area. Especially being it will be right off the Highway.

I know there is a lot of criticism regarding this project. The noise, Traffic, etc. I am sure the Rancheria is also concerned about this, and will take every step to work things out with all concerned. They are Good Neighbor's that have helped out so many here in the North State. Think of how many Jobs this will provide for our area.

Jobs that will have good wages and benefits. How can we not let this project go forward.

I understand both sides of this issue. I believe both sides should get together and build on that. Great minds working together to solve all their concerns.

We can not keep stopping progress in getting Businesses to build and stay here. We need them more than ever.

A6-01
(Cont.)

Thank You,

Bonnie Hurlhey

Bonnie Hurlhey
P.O. Box 976
City of Shasta lake, Ca. 6019
530-275-2815 home
530-275-7497 work

WRITTEN COMMENT CARD

BUREAU OF INDIAN AFFAIRS – PUBLIC HEARING MEETING
REDDING RANCHERIA FEE-TO-TRUST AND CASINO PROJECT

REDDING MEMORIAL VETERANS HALL – REDDING, CALIFORNIA
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(Please print legibly)

Name: Bryan Conn Organization: _____

Address: 4922 Sunnyhill Lane

Comment: In addition to all of the mentioned improvements to the current site of Win-River Casino, adjacent residents and businesses have had to contend with increases in drug sales and use, prostitution, theft, homelessness and congestion. Neighboring businesses and subdivisions have not flourished. As an immediate next door neighbor to the proposed project and a resident along the planned ingress/egress route, I fear the same fate will make our properties much less habitable. I oppose the planned project for these and other reasons

Thank you

I7-01

Please give to attendant, drop in Written Comment Box, mail to Bureau of Indian Affairs, Attention: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way Room W-2820, Sacramento, CA 95825, or email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use "Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project" as the subject of your email.

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(Please print legibly)

Name: DALE SMITH Organization: _____

Address: 5851 FARM HOUSE LN.

Comment: NO CASINOS NEEDED BY ANYONE!! LAND IS TOO BEAUTIFUL HERE. I8-01

Please give to attendant, drop in Written Comment Box, mail to Bureau of Indian Affairs, Attention: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way Room W-2820, Sacramento, CA 95825, or email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use "Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project" as the subject of your email.

Comment Letter I9

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(Please print legibly)

Name: Danika Adams Organization: private resident

Address: 19153 Smith Ln. Redding, CA 96002

Comment: The study is NOT COMPLETE. We still do not have enough information about the impact of traffic to our neighborhoods. We know bald eagles use the land for their hunting, we see them ALL the time. Churn Creek Bottom is agriculture land and why many of us BOUGHT OUR PROPERTY.

I9-01

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(Please print legibly)

Name: Dennis Grady Organization: _____

Address: 1936 Caines Ct. Rdg 96002

Comment: I am not against the casino. I am against the location. No more building in the beautiful Churn Crk. Bottom. Don't crack the deer open

Please give to attendant, drop in Written Comment Box, mail to Bureau of Indian Affairs, Attention: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way Room W-2820, Sacramento, CA 95825, or email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use "Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project" as the subject of your email.

I10-01

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(Please print legibly)

Name: Devin Ryan Organization: Redding Rancheria

Address: 1604 Imperial Dr. Redding, CA 96003

Comment: This Project is exactly that; a Project. It is a lot of work, and definitely a lot of change. What surprises me the most about the community outlook is specifically those against the project, how on average, the people seem mostly to be the generation that should understand MOST that change is inevitable. I represent a minority of this community, though arguably the most important, the future generation. I am 23-years-old, and along with my significant other of 18-years-old, we have just purchased a home right off S. Bonnyview.

I11-01

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Comment Letter I11

As such, I feel very strongly that I posess a very valid opinion on the matter. I am not a tribal member, though I am currently employed by the Redding Rancheria, the likes of which alone have allowed my life, which has always been in Redding, to flourish exponentially. The issues at hand are negligible in comparisson to all this tribe will do in our future, and more importantly all they have done and have had to do. The land being proposed is the tribes land. It always has been and will always have come from that. The lands use currently is very much underutilized. Currently simple grazing land, this piece of property brings the people of Redding no benefit. People in prospect of moving to or visiting Redding see this land as the one thing it is, empty. Much misinformation has been spread about what this project will be. This tribes people are the exact people that should be trusted in maintaining quality and longevity of any land, let alone their own. They understand this community, they borderline founded it, and they understand and listen to what the people do and do not want. They understand the magnitude of this project, especially for Redding, and from personal inside experience can say their entire goal is in representing this community in the most efficient and beautiful way possible. The cows will not run out of grass, the skyline will only be improved with a tremendous example of the human element, and Redding will gain an amazing destination spot of which it very much needs for our economy.

I11-01
(Cont.)

WRITTEN COMMENT CARD

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(Please print legibly)

Name: Dana Kirschman Organization: NA

Address: 2708 Eel Drive

Comment: Concerns for parents home/residence with increase traffic on foot in local neighborhood near Casino with increase crime. California Children Services. A casino less than ½ mile away will increase traffic both automobile and foot traffic. An expansion would increase crime in the neighborhood.

I12-01

Please give to attendant, drop in Written Comment Box, mail to Bureau of Indian Affairs, Attention: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way Room W-2820, Sacramento, CA 95825, or email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use "Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project" as the subject of your email.

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(Please print legibly)

Name: Donna Buchanan Organization: _____

Address: 19557 Sunview Lane Redding CA 96007

Comment: Myself along with my family whom reside in the Churn Creek Bottom area of Redding do support the Redding Rancherias proposal to put their property to related their existing Casino and added facilities in New Construction to proposed trust property. I feel they have covered all aspects of producing any environmental impacts associated with the proposed action. This proposed action is a very much welcome project to Shasta Co.

Most Sincerely Donna Buchanan

I13-01

Please give to attendant, drop in Written Comment Box, mail to Bureau of Indian Affairs, Attention: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way Room W-2820, Sacramento, CA 95825, or email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use "Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project" as the subject of your email.

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(Please print legibly)

Name: Donna Fitzpatrick Organization: One Way Construction

Address: 4586 Caterpillar Rd. Redding, Ca 96003

Comment: Our City needs growth + Decent paying jobs. I believe that the new casino would provide both.

I14-01

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WRITTEN COMMENT CARD

BUREAU OF INDIAN AFFAIRS – PUBLIC HEARING MEETING
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REDDING MEMORIAL VETERANS HALL – REDDING, CALIFORNIA
MAY 20, 2019

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WRITTEN COMMENTS ON THE DRAFT EIS MUST ARRIVE BY JUNE 17, 2019.
(Please print legibly)

Name: Ed & Carolyn Shaw Organization: _____

Address: 6001 Riverside Dr., Redding, CA 96001

Comment: We strongly oppose the "gaming facility" by the Redding Rancheria on any part of the seven parcels totaling 226 acres in unincorporated Shasta County So. East of City of Redding along the Sacramento River. In Reserving to Indian Gaming Regulatory Act Amendments of 2006, the statement in S 2078 (189th); the statement "Requires in addition a determination by the Secretary, after consultation with the tribe and the standard administration public hearing procedure, that a gaming establishment on that land would be in the best interest of the tribe and would not create significant, unmitigated impacts on the surrounding community." (over) I15-01

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The "Outdoor Ampatheater" will obvisously have a great negative impact! The entire subdivisions North & South of Bonnyview will be at the mercy of each venue coming to perform, The impact will also disturb wildlife who are up and down the Sacramento River.

I5-01
(Cont.)

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(Please print legibly)

Name: Gary Morris Organization: —

Address: 6371 Riverside Dr. Redding Ca.

Comment: Redding does not need a place at our gateway for tweakers to hang-out!
This is some of the finest farmland in the world!
The indians should be aware of this & hold that sacred!
Not a place to bilk senior citizens out of their social security! Stop the greed!

I16-01

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(Please print legibly)

Name: Jasmine Romero Organization: Redding Rancheria

Address: 3483 Capricorn Way Redding CA 96003

Comment: I have worked for Sun-River for 7 years. I plan to retire from the casino. I will be able to retire due to the great benefits they offer. The casino provides a 7% 401K match. No cost for Medical, Dental, Vision, EAP, FSA and Life Insurance! The casino is always looking for ways to provide us team members the best! I love that they truly do care about us and our well being. We are family and all look after one another. How could providing a better life for team members & their families be wrong?

I17-01

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(Please print legibly)

Name: Jean Fellman Organization: Churn Creek Bottom Homeowners + Prien

Address: 1985 Trumpet DR. Redding

Comment: I have no complaints against Redding Rancheria. They provide alot of money to numerous projects in northern California. I don't think they need to relocate to the Strawberry field. It is a beautiful area that needs to stay that way. There will be noise and light pollution. Bigger is NOT better. We don't need a little Las Vegas. I18-01

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(Please print legibly)

Name: Jeannie Winstead Organization:

Address: 1988 Jeanae Ct. Redding, CA 96002

Comment: I am not in favor of the casino being built off I-5 near the Bonneyview exit for the following reasons:

(1) Redding/Anderson cannot take care of the existing crime, drugs, homelessness, theft, etc. that we currently have. We cannot add more + a casino will bring in some of that element. That cannot be denied.

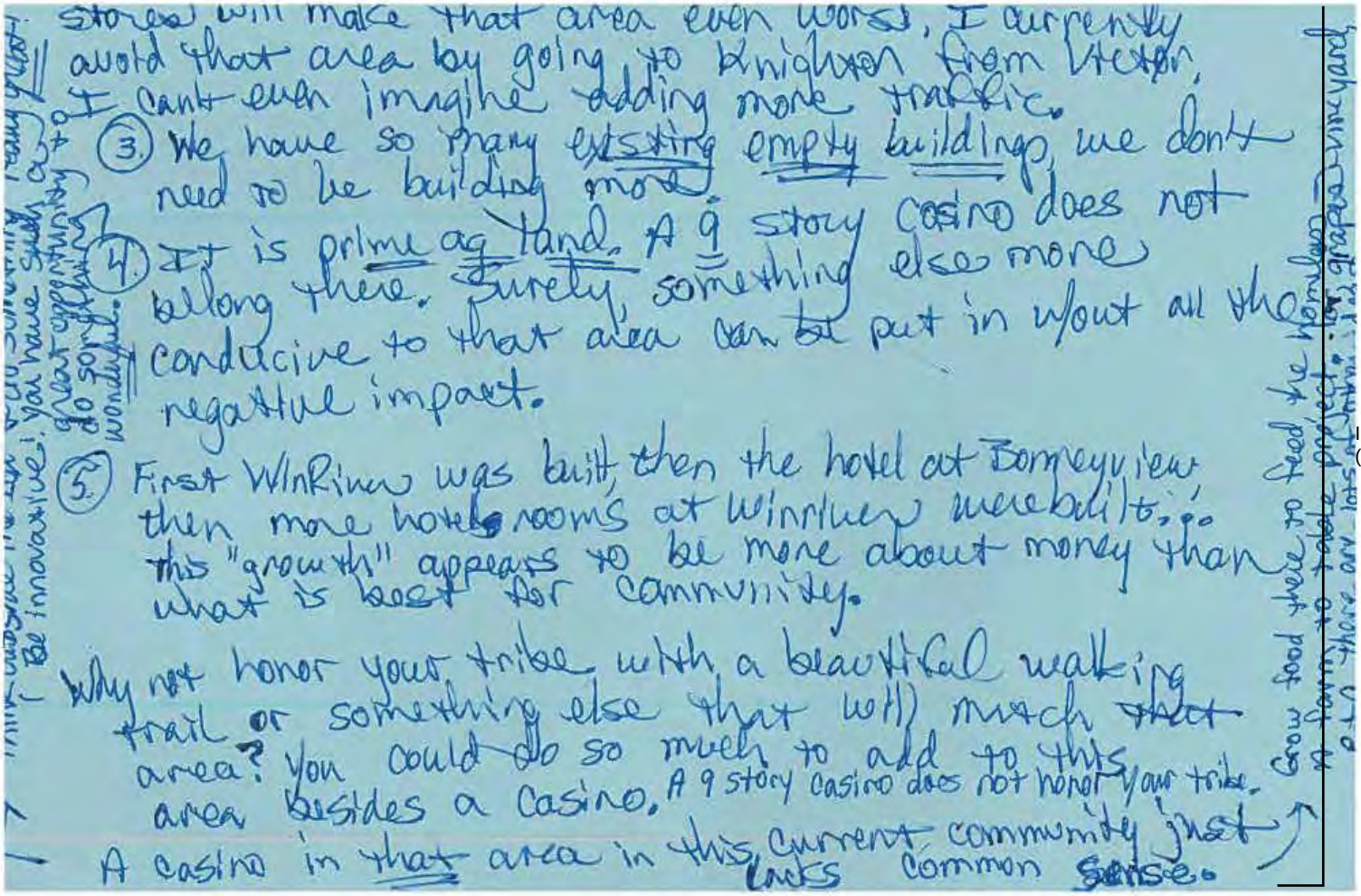
(2) That area cannot currently support the existing traffic. It is a mess. Adding a casino, costco, other

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* this meeting has been all about what money can buy rather than the real issues — the actual impact the casino will have in the area.

I19-01

I19-02



stores will make that area even worse. I currently avoid that area by going to Knighton from Victor. I can't even imagine adding more traffic.

(3.) We have so many existing empty buildings, we don't need to be building more.

(4.) It is prime ag land. A 9 story casino does not belong there. Surely, something else more conducive to that area can be put in w/out all the negative impact.

(5.) First Winners was built, then the hotel at Barneys view, then more hotel rooms at Winners were built... this "growth" appears to be more about money than what is best for community.

Why not honor your tribe with a beautiful walking trail or something else that will match that area? You could do so much to add to this area besides a casino. A 9 story casino does not honor your tribe.

A casino in that area in this current community just lacks common sense.

I9-02 (Cont.)

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(Please print legibly)

Name: Jenni Patterson Organization: community member / nonprofit worker

Address: 2199 Jewell Lane Redding, CA 96001

Comment: The Redding Rancheria is rooted in our local community and is a responsible steward of both the land and the resources they invest in local nonprofits. They are relentlessly supportive of programs that benefit our youth, whether they are tribal members or not, because they care about the future of this community. I'm proud to be part of a community in which everyone seeks the best for their neighbors. The thoroughness of the impact statement and the [redacted] Rancheria's history of community development, along with the jobs that will be created all lead me to support this project!

I20-01

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Comment Letter I21

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Name: Karen Bitter Organization: Home Owner

Address: 4850 Balls Ferry Rd, Anderson, Ca.

Comment: We deserve more from So Cal to Redding for the bright lights of Hollywood

What would the Indian Forefathers say about the use of the Sacred River

Karen Bitter

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I21-01

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(Please print legibly)

Name: KIANNA Benner Organization: Win-River / Redding Rancheri

Address: 5814 Old Barn Way Redding, CA 96001

Comment: I personally am where I am today due to Redding Rancheria's resources. I've been able to receive scholarships that have allowed me a private education, participate in sports, & to pursue my bachelor's in Early Childhood Education & provide me w/ the motivation & support to open a business that would help the community further. I am just one of many. This is a good thing. I22-01

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(Please print legibly)

Name: Larry Fultz Organization: Redding Rancheria

Address: 1961 Redding Rancheria Rd Redding, CA 96001

Comment: This Casino will bring jobs from all over to Shasta County not only for the Construction but To employee after Completion OF Casino.

I23-01

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(Please print legibly)

Name: MAE GUTHRIE Organization: _____

Address: 4212 LONG DRIVE CT.

Comment: I'm concerned that the overpass at 15 + Bonney View can not hold up to more Traffic. It Already Shakes when Traveling over The overpass. I24-01

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(Please print legibly)

Name: MICHAEL SCHRAMER Organization: _____

Address: 19441 SEA LN REDDING CA.

Comment: GAMBLING RESULTS IN TAX PAYER PICKING UP THE BILL. DESTROYS FAMILIES FINANCES, FINANCIALLY HURTS CHILDREN. TRIBE PAYS NO TAXES, TRIBE DOES NOT RISK THE GAMBLING DOES FOR MATHMATICLY CHALLENGED. DOES REDDING WANT TO BE KNOWEN FOR ANOTHER CASINO VS NATURAL BEAUTY — ? WHY ANOTHER EYE SORE — SITE IS FISHING DESTINATION KNOWEN WORLD WIDE EYE SORE

I25-01

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Thank you for this opportunity to speak.

My husband and I lost our home in the Carr Fire... We built it ourselves nearly 40 years ago. We raised our 3 boys there.

Our spirits were broken, yet the river is healing. We decided to spend our life-savings in order to purchase a home directly across the river from your proposed project. We were certain the tribal Elders and Bureau of Indian Affairs would never exploit our beautiful Sacramento River.

I26-01

You hold the power to create that river sanctuary we can all be proud of- peaceful, quiet, solitude... where souls heal and spirits soar.

Shame on you for even considering Alternative A!

Thank you

Patricia Furnari
530-945-0453

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Name: Rich Todd Organization: —

Address: 2622 Clover Crk St., Redding, CA 96002

Comment: Rolling Hills Casino is 1½ mi. S of Solano St, Corning (main business distr). Win River's new casino will be in a very congested area near Costco to W and Panda Express, Save Mart, In N Out Burger, Ross Dress for Less, and Less Schwab Tires. Win River Casino will add 1,200 cars per day to already congested S Bonnyview and I-5 traffic. How will Win River customers enter casino? Will it be from S Bonnyview or Smith Rd (no I-5 interchange). Rolling Hills is small town with minimum congestion. The new Win River will add congestion to congestion I27-01

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Name: Tom Kirschman Organization: _____

Address: 2708 Eel Dr. Redding, CA

Comment: Not against the tribe, but against the location. Traffic is already a night mare and the proposed development is not responsible. Horrible plan.

I28-01

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(Please print legibly)

Name: VICKI KILLION Organization: _____

Address: 3660 OKO ST

Comment: DO NOT MOVE THE CASINO CLOSER TO REDDING!

I29-01

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Name: Wendilyn Jessop Organization: _____

Address: 1785 Conifer Wy Redding

Comment: I am happy and supportive of all the ways your organization does good, but that is not the issue. It is about location. I am opposed to developing the proposed land for a casino. We need our farmland for more than another resort.

Thank you

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I30-01

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Name: Wendy Foott Organization: _____

Address: 6407 Hemlock St

Comment: Please do not allow this Monstrosity

I31-01

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Name: _____ Organization: _____

Address: _____

Comment: Statistics against expanding Casino:
Only 4% of income at casinos from the 75% Casual gambler
? 40-60% from gambling addicts that eventually
use fraud or stealing crime to support habit
See article in Atlantic

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I32-01

WRITTEN COMMENT CARD

BUREAU OF INDIAN AFFAIRS – PUBLIC HEARING MEETING
REDDING RANCHERIA FEE-TO-TRUST AND CASINO PROJECT

REDDING MEMORIAL VETERANS HALL – REDDING, CALIFORNIA
MAY 20, 2019

IF YOU WOULD LIKE TO SUBMIT A WRITTEN STATEMENT, PLEASE COMPLETE THE FOLLOWING INFORMATION AND COMMENT IN THE SPACE PROVIDED BELOW. GIVE TO ATTENDANT OR DROP IN THE WRITTEN COMMENT BOX. COMMENTS MAY ALSO BE SUBMITTED BY MAIL OR EMAIL TO THE CONTACT INFORMATION PROVIDED BELOW.
WRITTEN COMMENTS ON THE DRAFT EIS MUST ARRIVE BY JUNE 17, 2019.

(Please print legibly)

Name: Debe Hopkins Organization: Anderson Chamber

Address: POB 1144 Anderson CA 96007

Comment: The Rdg Rancheria is vital to the Anderson Chamber as well as the city as a whole. They donate money, merchandise & meeting space which saves us a significant amount of money which can be spent to enhance & assist our business community. As they grow, so grows our community. They are stewards of the land and as such it only makes sense that they will do far more good than harm to the new location. I33-01

Please give to attendant, drop in Written Comment Box, mail to Bureau of Indian Affairs, Attention: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way Room W-2820, Sacramento, CA 95825, or email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use "Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project" as the subject of your email.

From: **Michael Crook** <michaeljaycrook@gmail.com>
Date: Wed, May 22, 2019 at 3:11 PM
Subject: [EXTERNAL] Public Comment on Casino location
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

Good afternoon,

I would like to throw my support behind the proposed development area off of I-5 for a new casino, hotel, entertainment venues and an outdoor sporting goods store.

This project has a lot of potential to impact the city of Redding and Shasta county in a positive way. First, moving the casino from its current sketchy area to this particular area across from the proposed Costco relocation is great because the entire area as a whole is undergoing a transformation in terms of economic activity and having the casino in this area has the potential to bring in a much larger and more diverse clientele. It also offers Redding residents (and those passing by) a bunch of amenities in terms of restaurants, shopping, and tons of entertainment. This area is the perfect location (the other ideas of expanding the current casino or moving to Anderson don't hold as much promise for Redding residents). The argument of "well there's a lot of other development in the area so traffic conditions will worsen" is faulty because roads will be addressed in the area to handle the traffic and more economic development in the area makes it a better spot in terms of accessibility.

The argument of not allowing a major outdoor sporting retailer in because it's bad for smaller retailers is ridiculous. Outdoor sporting goods are something that will always be in demand in the area so having a larger retail option (I assume cabelas or bass pro shop) is a good thing for residents in terms of having more options. If smaller companies can't compete with Cabelas, that seems like an issue that those companies will have to address. Might as well shut down the internet to keep the libraries open! I34-01

The argument that the city council will have to bail out the civic center because it can't compete with the much cooler entertainment venues potentially being offered by the tribe is also ridiculous. Don't bail them out dummies! Lol. In all seriousness, these types of entertainment venues that you see at casinos (especially these ones) means that bigger names will come here!!That's awesome for the area because we don't have much of that now. Maybe even get some bigger name comedians to put on some shows here. This is all good and it's all progress and I'm tired of people around here fighting progress!

For what it's worth I hope this and the other projects in the area get approved because this little podunk town needs it! This is a city, not a small town anymore! Keep growing! Keep expanding! This expansion is big for the tribe and for the city and the city should be fighting for this because it's a win for everyone!

-Michael Crook

--
Thank you,

Michael Crook, PSM
P: (405) 802-2693

Comment Letter I35

From: **Savanna Edwards** <edwardssavanna07@yahoo.com>
Date: Thu, May 23, 2019 at 12:05 AM
Subject: [EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

Hello Chad,

My name is Savanna Edwards and I am writing this email as a comment on the proposed new Win-River Casino that is to be located on Interstate 5. First and foremost, I would like to thank you for your time at the public hearing that was held on May 20th. Although I did not speak, we did hear many others who spoke thoughtful words. I appreciated those. My heart was filled with much joy when I would hear the words "the Redding Rancheria changed my life". It is amazing to know that a tribe, who fought to be who they are today, who fought to have the ability to change so many lives, actually change so many lives!

To start, I would like to say that I 100% support the move of Win-River Casino to Interstate 5; here's why: The Redding Rancheria has taught me more than you can imagine. As a 21-year-old, I have had outstanding opportunities than I would have if I were to seek a job outside of the tribe. Although I am a tribal member of the Redding Rancheria, I do not speak any of these words because I'm "supposed" to support my tribe or my family. Instead, I speak these words out of honesty, truth, and facts. Between the ages of 14-17 years old, youth tribal member's have an amazing opportunity to become employed within Redding Rancheria affiliated businesses. Whether you become a gas station clerk, a hostess at the casino restaurant, or work with public works, they give you the potential to **grow.** I did become one of the hostesses at our restaurant, but I realized that it wasn't for me. I needed to **spread my wings** and **explore** what the Rancheria had to offer me. I decided that working with our Education Department was where I wanted to be. I began working with our Education Department at 15 years old and learned more than any 15-year-old could learn at your local fast food location. The reason why I bring up our Youth Employment Program is because of the success and confidence that shines from our youth. The work ethic that is embedded in their souls is not something you see in today's society. Imagine what type of opportunities the casino would have on others other than tribal youth members. The more you grow, the more opportunities you can spread within your community. This confidence and success that shines so bright is not something our Elders thought they were going to see for the future generations. And that is because of people who looked at us like trash, or as worthless people. Then one day, our lives changed forever. After research and strength, we finally became a federally recognized tribe and **flourished**. Our elders saw visions, they saw our future leaders creating memories in our gorgeous creek... they saw **potential**. They saw **success**. They saw **growth.** I35-01

Personally, I believe the casino is something more than anyone expected. When you start to **flourish** and **succeed** further then anyone can imagine, you realize that you have the **potential** to find more ways to **grow**. **Growth** is not a dirty word. Anything can **grow**, whether its a business or someone receiving a promotion, **growth** is needed for everything. The Redding Rancheria is trying to **grow**. Win-River Casino is trying to **grow**. As far as I can see, unfortunately, we have people who want to oppose **growth** upon the Redding Rancheria, Win-River Casino, and The City of Redding. The biggest concerns that I have recently heard of are the economic impact on our other local businesses and the traffic concerns. And that all is understandable. But how is a city or town supposed to **grow** if there isn't **growth** within it? We simply, as a town, cannot just oppose everything new that brings **potential growth** in this area. How are our future generations going to deal with the lack of businesses or the lack of careers passed down to them? If Win-River Casino moves to Interstate 5, the economic impact would be a **positive**, not a negative. When our leaders today step down and hand over Redding, we need our future generations to be proud of us, not have to clean up a mess we created due to our ways. Redding, California deserves **growth**. Our future generations deserve **growth**. We, as members of Redding today, deserve **growth**.

Thank you so much,
Savanna Edwards

Date: Thu, May 23, 2019 at 11:08 AM
Subject: [EXTERNAL] Redding Rancheria Fee-to-Trust and Casino Project
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

Mr. Broussard,

We fully support the above referenced project and would welcome it to our community. I36-01

Daniel McGann & Blossom Hamusek
2874 Camulos Way
Redding, CA 96002

Comment Letter I37

From: Don Barich <donbarich@yahoo.com>
Date: May 23, 2019 at 9:39:05 AM PDT
To: "amy.dutschke@bia.gov" <amy.dutschke@bia.gov>
Subject: [EXTERNAL] New casino in Redding....

Dear Ms. Dutschke,

I am a resident of Redding and I am writing to you in opposition to the proposed casino off of Hwy 5.

The new casino would bring a lot of noise and congestion to what is currently a rural area south of the proposed site. Of concern in particular is the proposed open air amphitheater. At night noise carries significantly and this would have a negative impact on the quality of life in the surrounding areas.

I37-01

In addition, the additional traffic would cause an already congested area to become worse and no offense to the casino itself, but additional crime (which is already high in Redding) would also accompany this development. I have had several friends have their cars broken into while parked in the parking lot of the current Win River casino.

Again, as a resident of Redding, I am voicing opposition to this proposed project.

Thank you,

Don Barich
7598 White Birch Lane
Redding, Ca 96002

From: **Michael Middendorp** <mimiddendorp@gmail.com>
Date: Wed, May 22, 2019 at 11:02 PM
Subject: [EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project
To: <chad.broussard@bia.gov>

Mr. Broussard,

I'm writing this email because I believe the City of Redding has concerns that should NOT stop the and Casino Project. The Cities main worries are the traffic and competition for local businesses. If the Casino is allowed to be built, which would pave way for the new Costco, a traffic solution would be inevitable. Besides, a traffic problem would also be a problem for the Casino as well as they would lose business because of it. I firmly believe that the Redding Rancheria with their years of planning and strategizing would do everything in the best interest of the people around them. This includes and is not limited to any solution that would maximize the flow of traffic.

The other worry that the city has is that it will provide competition to local businesses. As everyone knows, the United States runs on capitalism. Adding more competition to an area can and will benefit the citizens of that area and surrounding communities. I38-01

The new Casino will bring 500+ new local hires, not to mention the thousands of construction jobs. It will also bolster Redding's economy in the form of taxes paid to the city, new income earners, more Interstate 5 travelers (That will spend money), and pave the way to new projects down the line that will ultimately improve our city.

This isn't just about making more money the Redding Rancheria has given so much to the Shasta County area and having a larger, more profitable casino will just allow them to give more and help many more people!

I sincerely hope that you consider all the good the Redding Rancheria has done and will continue to do in the coming years. They are an integral part of our society and I'm glad we have them!

Sincerely,
Michael Middendorp

4169 Bechelli Ln
Redding, CA 96002
MiMiddendorp@gmail.com
530-515-1716

---------- Forwarded message ---------
From: <javaheads3@aol.com>
Date: Sat, May 25, 2019 at 7:54 AM
Subject: [EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project
To: <chad.broussard@bia.gov>

Dear Sir,
I am a longtime resident of redding and live near the site of the proposed new casino. I don't believe the EIS adequately addresses the traffic situation on S Bonneyview and at the I-5 freeway exit there. The potential congestion is going to make that area very difficult to navigate for those of us who live nearby. Also, the lights and sound coming from an event center will have a very negative effect on local residents, as well as on the river.
Salmon are sensitive to light and noise. Don't we with to protect them? I can't believe that having wastewater treatment, in creased noise, lights and a big parking lot is going to improve habitat for eagles, salmon and other species that live in that environment.
Additionally, this proposed casino would be the first thing people entering Redding would notice...not our trails, lakes, mountains or fresh air. A casino. While this may financially benefit the Rancheria, I don't believe that it represents what is unique and valuable about Shasta County. Gambling isn't a healthy, family oriented activity. Please don't put a casino on S Bonneyview. It's not the right location. Too much is at stake. And if the old Win-River is closed, why not turn the hotel into a residential drug/alcohol treatment center? THAT would surely provide a service that our entire community would benefit from.

I39-01

Sincerely,
Hazel Hughes
3907 Alma Ave
Redding, CA 96002

Comment Letter I40

From: Shelly Hutchinsonshelbell03@aol.com
Date: Sun, May 26, 2019 at 10:39 AM
Subject: [EXTERNAL] New Casino
To: <chad.broussard@bia.gov>

Hello,

I'd like to comment on the new casino/resort plans.My two concerns, other than respecting the environmentalimpacts to the landitself, are the height of the hotel and the retail/event space.

I prefer the idea oftoning down the size, or at least the height of,the hotel itself.It would have sucha highprofile, it would really impactthe feel of theentrance to town, as well as be taller than any building IN town (Ibelieve).I would like to see the building itselfbesmaller;or, keep the number of rooms and overallsizebutexpand itout, rather than up. I40-01

I'd also like to suggest the idea of eliminating the retail space and enlarging the plannedevent space.Thatwould remove most of thecompetition with the Civic Auditorium, and give our area a second,larger space todraw froma different pool of actsto be presented, with a larger capacity for attendees.This would alloweachevent center to have their niche market, with the larger venue providing different shows to more peoplethan the Civic Auditoriumcan accommodate.(And of course, we have the lovely CascadeTheater for the more intimate shows.) I40-02

And a bigthank you tothe Tribe for all they contribute to the community!Thank you for your consideration.

Shelly Hutchinson

Redding, CA

Sent from AOL Mobile Mail

Get the new AOL app:mail.mobile.aol.com

Comment Letter I41

May 26. 2019

Kathy Grissom

4788 Balls Ferry Rd.

Anderson, CA 96007

Amy Dutschke, Regional Director

BIA, Pacific Region

2800 Cottage Way

Sacramento, CA 95825

RE: Draft EIS Comments, Reddng Rancheria Fee to Trust nd Casino Project

I'm writing in adamant opposition to the proposed expansion/moving of Win River Casino for many reasons.

At this crucial time in history, with humans causing such an environmental crisis already, I think it is unconscionable to develop any open land, much less land that is so rich agriculturally and so close to the river. This land is extremely important to wildlife, who have already lost so much of their habitat in this area.

This project is wrong because: It is not aesthetically pleasing as a gateway to the City of Redding. It will create immensely more greenhouse gas emissions at a time when the city should be DECREASING greenhouse gas emissions. It is not needed and will take business away from existing businesses, possibly causing more empty buildings in the city. It is a prime example of urban sprawl-something cities should be fighting against, not allowing.

I41-01

If the Rancheria has that much money, it should instead be used for something that will benefit all native people in need: what is needed desparately in this area is treatment for alcohol and drug addicts. I know the Rancheria provides outpatient services but that is not effective for many. They need to either build a residential treatment center or provide funds for addicts to go to a residential treatment center. The only reason I have ever supported indian gaming is if the profits are used in a real way to benefit natives in need.

Thank you. Kathy Grissom

Kathy Grissom

CC: Redding City Council 1

On Wed, May 29, 2019 at 10:33 PM Lang Dayton <langdayton@gmail.com> wrote:
To:

Amy Dutschke, Regional Director
Bureau of Indian Affairs Pacific Region
2800 Cottage Way
Sacramento, CA 96001

Chad Broussard, Environmental Protection Specialist
Bureau of Indian Affairs Pacific Region
2800 Cottage Way, Room W-2820
Sacramento, CA 95825
Dear Ms. Dutschke and Mr. Broussard:

The Draft Environmental Impact Statement for the Redding Rancheria Fee-to-Trust and Casino Project, Shasta County [DEIS] and its Appendices total over 5,000 pages. The Traffic Study ([Appendix K] alone is just shy of 2,000 pages.

I intend to file comments on the DEIS on behalf of my 501c3 organization, but the short notice with its June 3 deadline does not give sufficient time for an adequate review. Would it be possible to extend the review period to October 2019 and equally delay the date of the public hearing?

I42-01

Thank you very much for your consideration.

Sincerely,

Lang M. Dayton, Chair, Trails & Bikeways Council of Greater Redding

From: Paul Hughes<phughesred@sbcglobal.net>
Date: Wed, May 29, 2019 at 11:16 AM
Subject: [EXTERNAL] Proposed casino relocation by Redding Rancheria
To: <chad.broussard@bia.gov>
Cc: amy.dutschke@bia.gov

Following are the comments I prepared for the meeting at the Vets Hall in Redding May 20 but shortened as

others had made these points.

I am sending them to you because I still want my personal concerns on the official record of that meeting.

Thanks for taking the time to hear the community's many objections to this proposal that would have such anegative effect on our quality of life.

My name is Pam Hughes. I have lived in Redding for more than 50years.

I respect and admire my Native American neighbors and theircontributions to our community, which is why I voted several years agoto allow them to profit from their tribal lands by allowing gaming onthose lands. I43-01

Redding Rancheria has profited well from the casino, hotel, and otheramenities they have developed on their land. Their profits have allowedthem to acquire other businesses, including a second hotel, gas stationand mini-mart, and other properties, including the land on which theywant to build a mega casino complex on a tract of agricultural land theypurchased with their profits from their businesses, profits far beyond thatof normal businesses in our community.

Building a casino on this purchased land is in direct violation of theintent of my vote to allow them gaming privileges ONLY on their triballand. Their proposed complex, in addition to violating the intent of thevoters, would compromise the image of our community, the ecology of the land, and the quality of life for our citizens.

Their proposal should be denied.

From: Trish Stoffers<TrishS@redding-rancheria.com>
Date: Thu, May 30, 2019 at 9:57 AM
Subject: [EXTERNAL] Win River Casino
To:chad.broussard@bia.govchad.broussard@bia.gov

I recently attended your meeting at the Veterans Hall in Redding in support of the casino relocation. I would like to bring up a few points that no one actually brought to light during the meeting. I am not Native but have worked for the Redding Rancheria for over 17 years. I was hired as a door greeter after the remodel. I was 50years old and given the opportunity to move from a door greeter to being the administrative assistant to the Health Director at Redding Rancheria Tribal Health Center. I am still working for the Tribe at the Churn Creek Health Center. During that time, I have seen many changes in the casino, the Redding Rancheria and our community.

Clear Creek was a garbage dump before the casino came. It is now clean, has salmon again and water quality is checked daily by the Environmental department .A beautiful walking trail has been built including exercise stations, benches for viewing wildlife and exercise stations for those wanting to use them. The trail is for public use as well as for the staff. We are all encouraged to use the trail and the exercise equipment. We in fact, have a wellness coordinator who plans various activities and competitions for all staff members for all entities of the Redding Rancheria.

We do have a sacred site at the casino that is fenced to ensure no one bothers the site. The Redding Rancheriais very committed to the preservation and sanctity of their forefathers and the Native American ways of life. As an employee at the time of the grand opening of the remodeled casino, we were all taught about the symbols for the Tribe including the Yana, Pit River and Wintu tribes. They use those three symbols in everything pertaining to the Redding Rancheria. They represent the three different tribes which are flocks of flying geese. The Redding Rancheria Tribal Council and the staff are very proud of their heritage and share the knowledge of their tribe with anyone that wants to learn about their culture. They are proud of the baskets they have accumulated over the years. They proudly display the photos of the first 17 designees.

I44-01

They give a great deal to the community as a whole. They are very proud to be able to help build and support all the agencies including One Safe Place, Redding Police Department, and many, many more. They provide numerous jobs through the Redding Rancheria, the casino, the mini mart, Redding Rancheria head start, Redding Rancheria Tribal Health Center and Churn Creek Healthcare. The latter one provides health care to thousands of Medi-Cal and Partnership patients. We now have X-ray, Behavioral health services, a large Recovery program, physical therapy, cardiologist and chiropractic services provided to a mostly non-Native population.

I just want to express my support for this Native American owned company that gives so much to the community and supports the other local Native American communities as well. They offer housing and engery assistant to all Native Americans in this community. Jack Potter knows 99% of all the Native population not only in this community but our surrounding neighbors as well. Again, they took a caravan of numerous vehicles to show support and bring supplies to South Dakota during their pipeline battle. This is just one of the events they have done to support all Native people.

I want to state with the utmost confidence…The Redding Rancheria is one of the most environmentally conscious companies in California. I had the opportunity to see first-hand the clean-up at Clear Creek and the participated on their continuing effort to keep it clean. They have planted trees around the casino parking lots and other places on the acreage. Each morning, Clear creek's water is checked by the environmental department. No one will ever convince me they do not care about the environment. If they are allowed to build at the river location, they will be the best stewards of the land and the river. They treat the land as a scared part of the life style and will protect any and all of the ancestral sites.

In conclusion, I just want to state I am now almost 68 years old and still working. Every staff meeting Tracy Edwards reminds us we are a family. I did have a break down due to several factors including the death of my granddaughter and the Redding Rancheria family was there to support me I had a job to come back to when I was ready and I am so very grateful for my Redding Rancheria family. I know they support their staff through good and tough times as witnessed by the recent Carr fire. They gave employees that were evacuated free rooms at the hotel, they provided the entire community the event center for shelter and supplied food and water for the victims of the Carr fire. We had several employees that lost their homes and the Tribe also supported them. They in fact, gave vouchers after the fire to employees that lost their homes or were evacuated to help replenish the food lost during the power outage or whatever they needed. I was one of those evacuated and having that extra money for food was incredible. They are not only driven to help all Native Americans, they are here to help the community and their employees. As an avid environmentalist, I know they are good stewards of the land and all scared sites. I believe based on their history, the new casino and hotel will make our community better and stronger.

I44-01
(Cont.)

Thank you for your time.

Comment Letter I45

From: **Edmund Brewer** <edbrewer@sbcglobal.net>
Date: Sat, Jun 1, 2019 at 3:29 PM
Subject: [EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

I am in favor of the Win River Tribe to have the new casino off the I-5 freeway in Redding. I45-01

Sent from Mail for Windows 10

Stand Up For California!
"Citizens making a difference"
www.standupca.org

P. O. Box 355
Penryn, CA. 95663

June 3, 2019

Ms. Amy Dutschke
Pacific Regional Director
Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825
amy.Dutschke@bia.gov

RE: "DEIS Comments - Redding Rancheria Fee-to-Trust and Casino Project"

Dear Ms. Dutschke,

The following comment is being submitted on behalf of *Stand Up for California* (Stand Up) regarding the gaming application of the Redding Rancheria ("Tribe") for certain lands in Shasta County, California, referred to as "Strawberry Fields" and additional parcels, approximately 232 ac. of land to be taken into trust. Please include this letter as part of the Administrative Record. Stand Up's comments focus on federal Indian policy regarding the taking of land into trust and tribal government gaming. The environmental, fiscal and jurisdictional issues are addressed by the affected local governments.

In October of 2017, the Department of the Interior ("Department") issued proposed changes to the fee-to-trust process seeking to establish a two-step process to reduce the burden on tribal applicants. Stand Up viewed this effort as a necessary action by the Department to reform the fee-to-trust process providing greater fairness, balance and transparence. While no rulemaking has occurred, this gaming application provides a test of the proposed draft criteria.

The Tribe is identified as a restored Tribe which is not in dispute. It was restored by a stipulated agreement resolving the *Tillie Hardwick v. United States* case. However, there are a couple of questions that must be answered prior to the Record of Decision, 1) does a stipulated agreement authorize the Secretary of the Interior to acquire land in trust for the Tribe under the Indian Reorganization Act ("IRA"), 2) Does the stipulated agreement violate the California Rancheria Act? Consider the limitations in section 10 of the California Rancheria Act - *"all statutes of the United States which affect Indians because of their status as Indians (are) inapplicable"*. Congress terminated its relationship with the Indians on the Redding Rancheria at the request of the Indians living at Redding Rancheria. On October 15, 1955, the group passed a resolution requesting the Government give them fee title to their assignments of land. They asked that each person have a legal description of their land and all liens be forgiven. I46-01

It is required that the Department provide an analysis of whether the Tribe was *"federally recognized and under federal jurisdiction in 1934* under the reasoning in *Carcieri v. Secretary of the Interior*, U. S. Supreme Court Feb. 24, 2009 and/or the M-Opinion: *Reaffirmation of the United States' Unique Trust Relationship with*

Indian Tribes and Related Indian Law Principles, issued January 18, 2017.[1] This issue must be thoroughly addressed prior to the Record of Decision. The Secretary of the Interior lacks the authority to take land into trust for Tribes that do not meet the Carcieri reasoning.

Stand Up recognizes the legitimate need of the Tribal government to obtain land for housing and economic development, but we cannot support an abuse of Administrative Procedures, Regulations, Department Manual rules or an intentional misinterpretation of the Indian Gaming Regulatory Act ("IGRA"). On December 11, 2010, then Assistant Secretary Indian Affairs Secretary Larry Echo Hawk in an 8 page detailed and well-reasoned letter explained to the Tribe why Strawberry Fields could not be considered restored lands or eligible for gaming under IGRA. The letter further detailed that the 292 regulations did not support an exemption for gaming as after acquired lands.

I46-01 (Cont.)

Transaction Creates Precedent

This gaming transaction *should be treated* as a two-part determination by the Department of the Interior ("Department"). Not treating this transaction as a two-part determination will create precedent by processing and approving the Redding Rancheria gaming application on after-acquired lands as *"restored lands"* in order to re-locate an existing casino. This action affects the relationships of Tribes to other Tribes, to their non-tribal neighbors, and significantly disrupts long-established community plans.

Since 2003 the Redding Rancheria has been focused on acquiring certain lands in Shasta County, California, referred to as "Strawberry Fields". In 2009 the Tribe sent a request to the Office of Indian Gaming Management seeking a determination of restored lands under regulations set forth in 25 C.F.R. Part 292. In 2010, the Tribe amended its application to include an additional 80 acres for gaming and gaming ancillary purposes. In December of 2010, Assistant Secretary Indian Affairs Larry Echo Hawk sent a detailed 8 page denial letter to Chairman Jason Hart of the Redding Rancheria explaining why the proposed trust acquisition did not meet the specific criteria of a restored lands exception.

I46-02

Undeterred, the Tribe challenged the Secretary of the Interior and Assistant Secretary of the Bureau of Indian Affairs in federal court. The Tribe asserted that the Department did not take into consideration the Tribe's alternative offer to move all gaming to the new casino and close its original casino on after-acquired lands for which the Tribe previously used the restored lands exception. The 9th Cir ignored the *temporal and geographic* limitations of the regulation and directed the Department to reconsider the application with the alternative of the re-location of the casino.

The Department did not perform a thorough analysis of the impact relocation of an existing casino would have on federal policy, other Indian Tribes or the surrounding community of non-tribal citizens prior to the development of the MOU. There appears to be no consideration if IGRA provides for a restored lands determination to be transferable. Rather, former Principal Deputy Assistant Secretary Indian Affairs Larry Roberts created the new precedent by signing an MOU with the Tribe. There is nothing in IGRA or the 292 regulations that states, alludes, or instructs Secretarial discretion **providing for a restored lands exemption to be transferable.**

In a more recent letter dated February 28, 2019, Principal Deputy Assistant Secretary Indian Affairs John Tahsuda writes to United States Senator Dianne Feinstein and states, *"It is unlikely that the MOA will serve as a precedent for other restored tribes."* The precedent is the MOU that chooses winners and losers.

[1] https://www.doi.gov/sites/doi.gov/files/uploads/m-37045.pdf

this MOU was for relocation of an existing tribal casino. Mr. Roberts signed several MOU's/MOA's asserting overreaching federalism disrupting California communities. I46-02 (Cont.)

Recent Federal Court Rulings have Occurred that Directly Affect the MOU and Fee-to-Trust Transaction

The Memorandum of Understanding granting restored lands between the Department and the Tribe was signed on October 3, 2016 by Principal Deputy Assistant Secretary – Indian Affairs Larry Roberts. Mr. Roberts had authority to fill the position of former Assistant Secretary Kevin Washburn for only 210 days. Mr. Roberts's authority had expired in early August 2016. In a recent federal case, Judge Wilson (*Anne Crawford-Hall, et al. v. United States, et al.*, No. 2:17-cv-1616-SVW (C.D. Cal.)) ruled on the limited authority of the Principal Deputy Secretary-Indian Affairs reversing the land into trust decision by Mr. Roberts.[2] This ruling raises significant questions regarding the legal authority of the Memorandum of Understanding aside from creating an unprecedented new exception for the transfer of restored lands for gaming. I46-03

The MOU and Mr. Roberts' Action Did Not Comply With the Departmental Manual

In another California casino case in U.S. District Court, the Department has argued that Mr. Roberts' authority to act in place of the Assistant Secretary—Indian Affairs (and the Secretary) can be found in a provision of the Departmental Manual that provides for the Principal Deputy Assistant Secretary to assume the authority of the Assistant Secretary in the "absence" of the latter.[3]

A recent decision by the U.S. District Court of the District of Columbia, involving the Consumer Financial Protection Board ("CFPB"), is highly critical of a broad reading of "absence" when an Executive Branch vacancy occurs.[4] This case involves a dispute over whether a Presidential appointee, Mick Mulvaney, or the current Deputy Director of the CFPB, Leandra English, is properly the Acting Director of the agency.

In siding with the Trump Administration's legal analysis, the Court evaluated certain provisions in the Dodd Frank Act, which is the statute establishing the CFPB. The pertinent language states that the Deputy Director of the CFPB serves as the acting Director of the agency "in the absence or unavailability of the Director."[5] The Court looked to various dictionary definitions and found that "absence" is defined as "a failure to appear, or be available and reachable, when expected."[6] The term *"available"* was defined as *"immediately utilizable"* or "capable of use for the accomplishment of a purpose."[7] I46-04

The Court agreed, that these two words indicate a "temporary condition, such as not being reachable due to illness or travel."[8] These circumstances were distinguishable from the resignation of the CFPB Director, Richard Cordray, which was a permanent condition.[9] The Court also found that the absence of the term "vacancy" in the statute was a conscious act by Congress, as it used the term in other parts of the Dodd-Frank Act.[10]

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[2] In *Stand Up For California v DOI* in the Wilton issue made the original challenge in 2018, however, the Judge ruled in favor of the government. This ruling will be appealed.
[3] *See* 209 DM 8.4.B.
[4] *English v. Trump*, 2018 U.S. Dist. LEXIS 4571 (D.D.C. Jan. 10, 2018).
[5] 12 U.S.C. § 5491(b)(5)(B).
[6] *English* at *32.
[7] *Id.*
[8] *Id.*
[9] *See id.* at *33.
[10] *See id.* at *32.

The facts are very similar here. The last Assistant Secretary—Indian Affairs, Kevin Washburn, resigned from his position on or around December 31, 2015. Mr. Roberts, as the "first assistant" in the office, assumed the responsibilities of the Acting Assistant Secretary for 210 days, as permitted by the FVRA. On or around August 1, 2016, Mr. Roberts reverted back to his former position as the Principal Deputy Assistant Secretary—Indian Affairs.

Like the circumstances in the CFPB case, the Assistant Secretary—Indian Affairs was not *"absent"* for a temporary period, as a result of sickness or out-of-town travel. Mr. Washburn resigned and a vacancy was created for almost 13 months, until January 20, 2017. Any argument that Mr. Roberts was delegated authority for 13 months in the "absence" of the Assistant Secretary is an overly broad and unreasonable interpretation of this language in the Departmental Manual, given the permanence of Mr. Washburn's resignation and the length of time—more than a year—of the vacancy in the Assistant Secretary's Office. I46-04 (Cont.)

In the waning days of the Obama Administration, the then-Principal Deputy Assistant Secretary—Indian Affairs Larry Roberts executed an MOU creating a new precedent for the transferring of trust status from one parcel of land to another. Mr. Roberts relied on an incorrect interpretation of the IGRA. He ignored Administrative Procedures and Department Manuel guidelines and Regulations to justify his decision. The Department must recognize that the MOU has no force of law. Mr. Roberts lacked the authority to make a determination of restored lands.

The IGRA provides "limited exceptions" to gaming on after-acquired lands.

In order for the regulations in Part 292 to be consistent with IGRA's principals of cooperative federalism, the Act recognizes the rights of states and narrowly applies the criteria which include temporal and geographical limitations for restored lands. While the Tribe meets some of the criteria in 25 C.F.R. 292.12, it cannot meet the temporal limitation as was pointed out in the December 2010 denial letter. The regulation criterion is clear on how a tribe establishes connections to newly acquired land for the purposes of "restored" lands exception.

> 292.12(c) (1) "The land is included in the tribe's ***"first request"*** for newly acquired lands since the tribe was restored to Federal recognition; or
>
> (c) 2 the tribe submitted an application to take the land into trust within 25 years after the tribe was restored to Federal recognition ***and the Tribe is not gaming on other lands.***

Redding Rancheria has already used the restored lands exception on its *"first" request.* The Tribe is and has been gaming on other lands. I46-05

IGRA's exceptions were enacted so that newly acknowledged tribes and restored tribes would not suffer prejudice in seeking economic independence. ***Congress in its wisdom did not intend for the restored land exception to be used over and over again to allow Tribes to re-locate existing casinos off-reservation.*** Such an interpretation of IGRA circumvents the need for state approval and meaningful consultations with affected local government and the surrounding community of citizens. Such an interpretation is out-of-balance with the spirit of cooperation between states and the federal government.

The Department in review and consideration of the many comments submitted during Rulemaking in 2008 for the development of Part 292 made specific responses to suggestions to 292(c) 1 and (c) 2 stating:

> **"...the temporal limitations effectuate IGRA's balancing of the gaming interests of newly acknowledged and/or restored tribes with the interests of nearby tribes and the**

5

surrounding community." (Federal Register/Vol.73 No.98 Tuesday, May 20, 2008/Rules and Regulations page 29367)

What is the Complete Vision of the Tribes Plans that Affect the Human Environment?

The Tribe has several additional fee-to-trust transactions – 89.74 ac. that are contiguous identified as the Riparian Lowry parcel. Contiguous lands are eligible for gaming. 11.07 ac. that are on-reservation identified as North and South Parking lots, and 13.29 ac. identified as the Mini-Mart Hilton Property. These trust applications are pending as of April 2019. There has been to my knowledge no statement of the larger planned development by the Tribe or an analysis of the cumulative impacts to the surrounding community or local government.

I46-05 (Cont.)

Conclusion

In 2000, California voters were asked to amend the State Constitution to provide an exception to legalize slot machines and casino style gaming on Indian lands primarily in remote rural parts of the state. The voter pamphlet clearly stated in rebuttal to claims that Proposition 1A would put casinos in urban areas: ***"Proposition 1A and Federal law strictly limit Indian gaming to tribal land. The claim that casinos could be built anywhere is totally false…"*** As time has evidenced, Tribes, tribal attorneys and gaming investors have ignored a clean and clear reading of federal law and regulation seeking ever-clever ways to move tribal gaming or relocate existing tribal casinos closer to more lucrative urban markets.

I46-06

To restate our position, Stand Up recognizes the legitimate need of the Redding Rancheria Tribal government to obtain land for housing and economic development, but we cannot support an abuse of Administrative Procedures, Regulations, Department Manual rules or an intentional misinterpretation of the Indian Gaming Regulatory Act.

Sincerely,



Cheryl Schmit, Director
916 663 3207
cherylschmit@att.net
www.standupca.org

Chad Broussard, Environmental Protection Specialist, Pacific Regional Office, BIA chad.broussard@bia.gov

Honorable Mayor Julie Winter
And Honorable Members of the Council
City of Redding
777 Cypress Ave - Third Floor
Redding, CA. 96001
jwinter@cityofredding.org

SPEAK UP SHASTA! info@speakupshasta.org

From: Bob Madgic <bmadgic@yahoo.com>
Date: Wed, Jun 5, 2019 at 11:15 AM
Subject: [EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project
To: chad.broussard@bia.gov chad.broussard@bia.gov

On the draft EIS:

The most critical factor in the proposed casino in the Strawberry Fields Site is the protection of the Sacramento River from any further degradation. The Sacramento River is the most important resource in California.

The second most important factor is the protection Chinook salmon, one of the most important creatures in California.

The proposed casino project on the Strawberry Fields Site will further degrade the Sacramento River and further imperil Chinook salmon.

This proposed site should be rejected on these grounds, in favor of the two other options.

The EIS on page 2 – 20 identifies how the eastern bank of the Sacramento River is "actively eroding," and that boulders will be placed on the bank to stabilize it against this erosion. This so-called erosion problem and solution are misplaced and wrong. The erosion of river's bank is a natural process. Rip rapping to stop such erosion has long been identified as an error that contributes to the degradation of a river.

A river is supposed to meander as a natural process. It is critical to its health. The Sacramento River should be allowed to overflow its banks where possible and even create new meandering avenues in the future, perhaps in the Strawberry Fields land. To prevent it from doing so by rip rapping its banks with boulders harms the natural functioning of the Sacramento River. I47-01

To restrict the river to its present channel by not allowing it to meander impairs the life cycle of Chinook salmon, which seek side channels to grow. The protection of Chinook salmon is of far greater import than an Indian casino that if constructed on this site will further damage the well being of this threatened species.

A dirt bank is habitat for the endangered bank swallow, which is identified in the EIS as seen dwelling on the bank that will be rip rapped with boulders. Doing so destroys this habitat for this endangered species that does not nest in rock boulders.

The fact that the Sacramento River flows right alongside the Strawberry Fields Site should by itself negate this option for a massive casino with all of its trappings.

The BIA must exercise its overriding responsibility to protect critical environmental assets and reject the Strawberry Fields Site as an option for the expanded casino.

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Bob Madgic, PhD, author, The Sacramento: A Transcendent River

Anderson, CA 96007

From: **Dale Widner** <dale.widner@yahoo.com>
Date: Tue, May 28, 2019 at 9:49 AM
Subject: [EXTERNAL] DEIS Comments, Redding Rancheria Project
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

I attended the public hearing for the Redding Rancheria Project on Monday, May 20, 2019.

At the public hearing for the Redding Rancheria Casino on Monday, May 20, 2019, lots of folks specifically objected to the Strawberry Fields site as being too nice a site to lose to development of a casino/resort. The public did not want to lose the view. Some people also suggested other sites for the casino.

Alternative Site - Knighton Road lands owned by Redding Rancheria

With that in mind, the Redding Rancheria also owns 42 acres of land just northwest of the Knighton Road interchange (Exit 673) that has plenty of I-5 frontage. Why not consider this as an alternate site for the casino in the EIS?

Please include this site owned by the Redding Rancheria as a community suggested alternative site (shown in yellow below).



I48-01

Knighton Road Site

Traffic

Access via existing Knighton Road interchange - would not require an additional interchange in the Churn Creek Bottom area at Smith Road

- Far lower existing traffic volumes and other issues at this interchange than at the Bonnyview area (intersections #3, #4, #5, #6, and #7 from the report)
- There is far more unused capacity at this interchange than at Bonnyview

I48-02

- Project traffic projections would be similar to those assumed for south access only (Option 3) at the Strawberry Fields site of the current traffic study
    - Project related traffic numbers would be applied at Knighton Road instead of at Smith Road
- Plenty of I-5 visibility for the casino without impacting the view for the public of the Strawberry Fields site

I48-02 (Cont.)

Other

- No city utilities available (Redding or Anderson) at this site (water, sewer, electric, natural gas)
    - All utilities can still be done, just not provided by a city
    - According to Section 2.10.6 of the report – a total of 42 acres is required for subsurface wastewater disposal at the Anderson site
        - The Anderson on-site wastewater disposal and treatment option was eliminated from further consideration because of not enough land available
    - If it really takes 42 acres of land for septic systems, then it looks like this site won't work
        - However, if a smaller waste water footprint can be developed - it may still work
        - Another option could be to tunnel under the Sacramento River (about 7,000 ft) with a sewer force main connected directly to the City of Redding sewer treatment plant
            - Could others help pay for a new sewer force main?
- If more land is desired, the tribe could pursue acquiring vacant and other neighboring properties summing to 13 additional acres (shown in red, above) on 7 individual lots adjacent to the southbound off ramp at Knighton Road (Exit 673)
    - Rules for the tribe for the added 13 acres say it can be used for virtually anything such as parking, stormwater detention, leach fields, – **BUT NOT FOR GAMING**
    - Gaming is only allowed on trust lands
    - 5 of the 7 lots have homes on them, the current "*Zillow*" value for the 5 lots with homes on them is about $1 million
    - Would create a total of 55 acres directly northwest of the interchange
- Still in Churn Creek Bottom area with all the issues that come with that – just not the Strawberry Field site
-
- Still has neighbor issues as is true for all the sites
- Problems listed for eliminating the Smith Road Interchange Alternative do not apply here
    - Less environmental impacts than a new interchange since it is already in place
    - Less potential for growth inducement since the interchange is already there
    - Does not have interchange spacing issues
    - Tribe may or may not pursue additional right of way (the 13 acres mentioned above)
- Views for the users/customers of the Knighton site are nowhere near as appealing as the Strawberry Fields site

I48-03

Please include this site owned by the Redding Rancheria as a community suggested alternative site.

Thank you for the opportunity to comment.

Dale Widner
19274 Azar Lane
Redding, CA 96003-8647
(530) 917-7949

— they never share

Dep RD Trust
Dep RD IS
Route ETT
Response Required
Due Date
Memo Ltr
Fax

DEPARTMENT OF THE INTERIOR

Bureau of Indian Affairs

5-31-19

Notice of Availability of a Draft Environmental Impact Statement for the Redding Rancheria Fee-to-Trust and Casino Project, Shasta County, California

AGENCY: Bureau of Indian Affairs, Interior.

this is so unfair, so unfair to our tribe. We have 610 members the Redding Rancheria has 211 members, they have had per capita for 26 years and never share

ACTION: Notice of availability.

SUMMARY: This notice advises the public that the Bureau of Indian Affairs (BIA), as lead agency, intends to file a Draft Environmental Impact Statement (DEIS) with the Environmental Protection Agency (USEPA) in connection with the Redding Rancheria's (Tribe) application requesting that the United States acquire approximately 232 acres of land in trust in Shasta County, California, for the construction and operation of a casino resort.

per capita Share 26

DATES: Comments on the DEIS must arrive no later than **June 3, 2019**. A public hearing will be held at the Redding Memorial Veterans Hall, 1605 Yuba Street, Redding, CA, 96001 on May 20, 2019 from 6:00 pm until the last comment is heard.

Never

its our territory

our territory

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

I49-01

FOR FURTHER INFORMATION CONTACT: Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, Pacific Regional Office, 2800 Cottage Way, Room W–2820, Sacramento, California 95825; telephone: (916) 978–6165; e-mail: chad.broussard@bia.gov. Information is also available online at **http://www.reddingeis.com/**.

SUPPLEMENTARY INFORMATION: The Tribe submitted an application to the Department of the Interior (Department) requesting the placement of approximately 232 acres of fee land in trust by the United States upon which the Tribe would construct a casino resort. The facility would include a casino, an approximately 250-room hotel, an event/convention center, an outdoor amphitheatre, a retail center, and associated parking and infrastructure. The new facility would replace the Tribe's existing casino, and the existing casino buildings would be converted to a different Tribal use. Accordingly, the proposed action for the Department is the acquisition requested by the Tribe. The proposed fee-to-trust property is located in an unincorporated part of Shasta County, California, approximately 1.6 miles northeast of the existing Redding Rancheria, and about two miles southeast of downtown Redding. The proposed trust

especially

So unfair especially to our Elders.

Elders

Draft EIS Comments
Chad Broussard, BIA
June 11, 2019

I am writing to express my opposition for alternatives A-D as described in the draft EIS "REDDING RANCHERIA FEE-TO-TRUST AND CASINO PROJECT (April 2019). My primary concerns focused on inadequate traffic mitigation as described in the EIS, inadequate noise evaluation criteria, and leach field connectivity to the Sacramento River.

Traffic

1. The location chosen obviously targets I-5 traffic yet will utilize a highly impacted interchange (Bonnyview road) without adequate compensation to the community. Casino should fully fund on-ramps onto Smith road overpass.

2. The tribe recognizes the potential for increased traffic volume as demonstrated in the statement; "Additionally, the Tribe intends to construct a solid wall at least 6 feet in height around the perimeter of the outdoor pool area at the Hilton Garden Inn to reduce ambient noise associated with increased traffic volumes on Bechelli Lane south of South Bonnyview Road." I50-01

3. It is unclear how the turn lanes described below can be constructed given the site's limited space. No map with dimensions was provided the reader.

"South Bonnyview Road / Bechelli Lane. Construct a second westbound (WB) left turn lane and corresponding receiving lane. Restripe the southbound (SB) approach to include two left turn lanes and a through/right turn lane. Restripe the northbound (NB) approach to include a left turn lane, a through/right turn lane, and a right turn pocket"

Noise

Methodology provided for **initial** relationship finding under one atmospheric condition (sound carry differences with temperature, wind, barometric pressure), however, no provision for residential feedback on event noise levels was described in the EIS. It needs to noted that an outdoor amphitheater is a unique change for the Redding area.

"A single family residential neighborhood within the City is located west of the site across the Sacramento River."

"5.11 NOISE

Sound levels shall be monitored at initial performances or "practice sessions" at the outdoor amphitheater to determine the sound levels at the nearest receptors based upon a reference sound level at 100 feet from the stage. To quantify this relationship, sound levels shall be monitored simultaneously at a point 100 feet from the stage and at one or more points near the northern boundary of the Strawberry Fields Site close to the nearest residential receptors. Once this relationship is established for the specifics of the venue, sound levels at the point 100 feet from the stage shall be monitored during events and, if necessary, the volume shall be reduced to ensure that the ambient sound level in the vicinity of residential receptors remains below 67 Aweighted decibels (dBA) equivalent sound level (Leq). Performers shall be required by contract to turn down the volume at the request of the Tribe if event conditions indicate this is necessary." I50-02

Wastewater

Alternatives A-D state that wastewater will be routed into the City's sewer system OR on-site disposal that includes a 46 acre leach field. It appears that city does not have the capacity to handle this new demand and that this critical element for the EIS is based on future efforts by the city to enhance the westside interceptor. If the casino wants to utilize the city's system it should pay for the westside interceptor phase 3 project. I50-03

"The Westside Interceptor currently exceeds its capacity during storm events and does not have additional existing capacity to accept flow from the primary casino site during peak flow events. However, according to the City of Redding Capital Improvement Plan for 2015-16 to 2020-21, the Westside Interceptor Phase III project is a planned sewer expansion project that includes building an additional 42-inch sewer pipe in parallel with the current pipe, which will double the wastewater conveyance capacity. The parallel pipe will be installed along Girvan Road and then continue south for a short run until it reaches the Clear Creek WWTP. This will provide sufficient conveyance capacity during all flow events for the wastewater generated from the casino.
The Westside Interceptor Phase III project is programmed to be designed in 2015-16 and constructed in 2016-2018. The City has reported that they are currently behind that schedule but that they plan to pursue the project in a timely manner with current plans to construct the project and have the additional capacity on line by the end of 2021."

I50-03 (Cont.)

If the on-site option is pursued, the leach field has the real potential to move nitrogen rich leachate into the Sacramento River. Soils in Strawberry field parcel are identified as highly porous and the southern portion contains 2 seasonal wetlands "***Seasonal Wetlands***Two seasonal wetlands (totaling approximately 0.041 acres) were identified in the Action Area."
This aspect is poorly evaluated in the EIS.

I50-04

"Appendix B

No onsite soil and subsurface explorations were done to obtain percolation rates and other parameters necessary to fully evaluate and consider this disposal option in detail. Design of any onsite subsurface disposal system will require actual site specific explorations and soil classifications. Percolation tests will be required and possibly groundwater monitoring for design.

I50-05

Floodplain
FEMA maps indicate that a large portion of both the Redding and Anderson sites are in a floodplain. This is significant, keeping in mind that the Shasta County Sewage Disposal Standards that are used as design criteria for this feasibility level study state in part that subsurface disposal systems "shall not include land subject to flooding."

I50-06

Thank you for your review and consideration of these comments

J. Scott Foott
6427 Hemlock St
Redding CA 96001

Comment Letter I51

From: **Jacquelyn Jansen** <cutiegirl20002005@yahoo.com>
Date: Tue, Jun 11, 2019 at 6:52 PM
Subject: [EXTERNAL] DEIS Comments, Redding Rancheria Project
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

My name is Jacquelyn Jansen. I oppose Win River's Relocation to Strawberry Fields! The relocation and expansion will only cause more traffic jams and accidents, harm to local animal and plant life, including but not limited to: Salmon, Bald Eagles, and other endangered species, increase in air, noise, water, and light pollution, destruction of more than 200 acres of land at the entryway to Redding, CA, draw more criminals to the surrounding neighborhoods, and will only cause a negative impact to local businesses! I oppose the relocation of Win River to Strawberry Fields! I51-01

Kind regards,
Jacquelyn Jansen

From: **Kathryn Patterson** <housekitty45@gmail.com>
Date: Tue, Jun 11, 2019 at 7:07 PM
Subject: [EXTERNAL] DEIS Comments, Redding Rancheria Project
To: <chad.broussard@bia.gov>

I am submitting my comments here regarding this proposed project in Redding, CA. I am Kathryn Patterson, residing at 1283 Denton Way, Redding, CA 96002 (homeowner for 29 years at this address). My phone is (530) 945-1093. Thank you for giving this matter your most sincere attention and study on behalf of those of us who will be adversely affected! It is truly a blessing when all parties' needs and concerns have been addressed and adequately satisfied!

I live off Churn Creek Road close to the S. Bonnyview I-5 exit/entrance. I have lived here since 1990 because it is a quiet, rural and agrarian area south of the main hubbub of the City of Redding proper. Even though this area has its share of urban sprawl, I am very concerned with the proposed exponential growth of this interchange, with Churn Creek Marketplace now under development, plans for a new Costco on Bechelli, and the BIA's proposed casino/hotel/parking to the southwest of this I-5 intersection. My concerns are multiple:

I52-01

1. As a Christian opposed to gambling, I do not want a large, commercial gambling establishment being a visible "Welcome to Redding trademark". I believe the current Win River location that is tucked away yet in an easily accessible location is a much more appropriate location for a gambling institution; or any other similarly situated location in our area if growth is needed.

2. As an environmentalist, I oppose the development of this prime agricultural land situated along our beautiful Sacramento River for two reasons:

a) it is home to many bird and animal species whose habitat is constantly struggling with human encroachment; if this land is currently owned by BIA, a far better, longer-lasting approach for this land THAT IS CONSISTENT WITH

NATIVE AMERICAN CULTURE is to use it as a "premiere landmark" preserve for future generations with walking trails, educational signs memorializing the Native American's history of this piece of land, and a museum. This could be done in conjunction or coordinated with The Redding Arboretum and Museum which has a large cache of local Indian artifacts;

b) the Strawberry Fields is prime agricultural land, and as such needs to be protected and preserved for its superb ability to grow food, especially organically, for an ever-burgeoning population.

3. As a close neighbor, I will not appreciate my everyday commutes navigating through a heavily trafficked freeway intersection and the accompanying heavier traffic on the three side streets I must use to go anywhere west or north (Churn Creek Road, S. Bonnyview and Bechelli Lane). I'm also concerned that a casino draws the drinking crowds, the drug users, and of course, the gamblers; and this will now be in the middle of my neighbor, all hours of the day and night.

I52-01 (Cont.)

4. As a concerned citizen of the City of Redding, I am concerned for the difficulties the City is facing far into the future because of the devastating Carr Fire 10 months ago that has created an acute shortage of housing. The City will need to address issues to maintain and improve quality of living and to promote a healthy community and neighborhoods in a sustainable way. Putting a gambling establishment as a mainstay and center of attraction for the City seems to be at odds with rebuilding our community and could even put additional stress on our state of affairs. We need to bring back our displaced families with sustained programs aimed at affordable housing and rebuilding, rather than providing infrastructure to a gambling casino.

From: **Lynn Clevenger** <lynn.clevenger@frontier.com>
Date: Tue, Jun 11, 2019 at 7:04 PM
Subject: [EXTERNAL] Win River Rancheria Expansion Project, Redding, CA
To: <chad.broussard@bia.gov>

Dear Mr. Broussard:

On behalf of my husband and myself, we would like to say we are all for the project south of Redding, CA.
Our main concern, since we live off S. Bonnyview Dr., is controlling traffic. Currently this area is very busy and we have witnessed numerous red light runners on a daily basis and refuse to proceed into the intersection until it is safe to do so.
I have been in touch with City of Redding planners and expressed concern for their idea of traffic solutions. A roundabout is not a smart solution and in my opinion will only create more congestion and traffic accidents.
If a smart, safe and financially feasible plan for traffic can be implemented then I see this expansion as a win win.
Thank you for the opportunity to share our thoughts with you regarding this project.
Sincerely,
Lynn and Cecil Clevenger

I53-01

Sent from my iPad

From: **Robert Fuller** <robertful@gmail.com>
Date: Tue, Jun 11, 2019 at 11:13 AM
Subject: [EXTERNAL] FW: DEIS Comments, Redding Rancheria Project
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

From: Robert Fuller
2238 Castlewood Dr.,

Redding, CA 96002

I accidentally left my address off my earlier email. I am not trying to unfairly increase the letters of opposition, but to ensure you know I am personally impacted by what you do.

I oppose the Redding Rancheria Project. The traffic it would add to Buena Vista is both an environmental assault on our rural community and a hinderance to businesses I want to see developed in that area.

The huge building is out of keeping with the existing character of the area.

We all know that the casino always wins, on average. That comes at a cost to the residents and visitors. While tax decisions are often made to shield the poor, gambling revenues are known to disproportionately take money from the poor, particularly innocent children.

Casinos also attract unwholesome and criminal elements which are unwelcome here.

Please do not inflict this damage on Redding.

I54-01

From: **Cathy Wheeler** <catherinedubs@att.net>
Date: Wed, Jun 12, 2019 at 5:50 AM
Subject: [EXTERNAL] Win river casino Redding, ca
To: <chad.broussard@bia.gov>

This is my two cents in the development of relocating win river Indian casino in Redding California from its current location to the I-5 location. I am in agreement with all, but the amphitheater. Sound travels very far and has no boundaries and can bounce off of everything. Redding city is already doing such a site at our civic center. Which is loud. And less than an hours drive south at the rolling hills Indian casino they have just opened a huge amphitheater where they are wanting already to increase size attendance to 10,000. We moved here for the quiet and peaceful atmosphere. Granted things change, but this us the one thing win river does not need to have. Please , please make this one concession win river can not have.

I55-01

C. Wheeler.
Home owner on e. Bonnyview, redding ca
Sent from my iPad

Comment Letter I56

From: **Dennis Daniel** <dennisdaniel@yahoo.com>
Date: Wed, Jun 12, 2019 at 11:03 AM
Subject: [EXTERNAL] DEIS Comments, Redding Rancheria Project
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

Dear Chad Broussard,

I am a nearby resident of the planned relocation of the Redding Rancheria project. I live on Denton Way, which is near a lot of upcoming development work, including the relocation of Redding Rancheria. I urge you to allow this project to proceed. I feel that while all of the development may lead to more traffic and other impacts, I still support all of this work going on. Redding Rancheria has been a great community partner and has done much work to support a lot of local causes.

While allowing the relocation of the Rancheria alone would probably not have a huge impact, keep in mind that there are some neighbors who are also upset that city leaders have allowed a relocation of Costco in this same general area, as well as a shopping center on the other side of the highway. You may very well get complaints about the Rancheria project because those neighbors have lost their fight on the other already approved projects.

I56-01

Thanks for your time.

Regards,
Dennis Daniel
1252 Denton Way
Redding, CA 96002

Comment Letter I57

From: **Irene Jackson** <ireneejstav@yahoo.com>
Date: Wed, Jun 12, 2019 at 11:47 AM
Subject: [EXTERNAL] Win River Casino Relocation
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

Hello

I am not opposed to the Win River relocation as I saw on Nextdoor. I know there are many people in the area against this and I believe the main concern is the increased traffic congestion that will occur. I live in the area off of Churn Creek Bottom and my concern is the traffic flow as it is currently an increasing problem especially from the intersection of Victor and Churn Creek bottom heading west towards I-5. The bridge over the freeway with the many traffic signals is extremely congested at times and confusing for travelers not familiar with the area. It is going to get worse. Hopefully the traffic engineers will have a plan in place with road fixtures and construction to accommodate the influx of vehicles within a one mile radius before Win River relocates along with plans for Costco. Good luck, I think it will be a better and more secure location for the casino, the employees and the visitors.

I57-01

Irene Jackson

From: **Christine Miille** <chrisstone1979@gmail.com>
Date: Wed, Jun 12, 2019 at 4:03 PM
Subject: [EXTERNAL] Win River
To: <chad.broussard@bia.gov>

Please do not allow Win River to relocate to strawberry fields. There crime at Win River is far too great for the area. The casino needs to stay away from other businesses and in less populated areas. It's interesting to me that an Indian casino would not be concerned with the environmental impact it would have. Please do not let them relocate to Strawberry Fields. I58-01

Christine Miille
3540 Riverview Drive
Redding, Ca 96001

From: **Kimberly Mare** <Luvluvtv@hotmail.com>
Date: Wed, Jun 12, 2019 at 2:10 PM
Subject: [EXTERNAL] Relocation of Win River
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

We are writing to express our very strong feelings against relocating Win River Casino. We live on the edge of the proposed property and am currently surrounded by cow fields and peace and quiet. We think it's completely fine where it is and do not desire it being placed near our home. We also think it's way too much traffic for the area and don't wish to have to endure excessive traffic every day. Also feel we will totally hear everything going on at the casino sight from people and cars to loud concerts. We are 100% against it and though we do go to current location for dinner and gambling we will boycott it entirely if it doesn't remain in current location. Thank you for listening. I59-01

Kimberly Mare
Dave Bailey
Redding CA

Sincerely

Get Outlook for iOS

From: <jjurin@charter.net>
Date: Wed, Jun 12, 2019 at 9:22 PM
Subject: [EXTERNAL] DEIS Comments Win River Project
To: <chad.broussard@bia.gov>

Hello my name is Denal Jurin and my husband
John Jurin
P.O. Box 494233
Redding CA. 96049 or
this email address jjurin@charter.net

We are writing you to state we are all for the casino moving to Strawberry Fields. We like the fact of how much WR supports our community and sponsors Health Fairs, we are both Seniors and they are very informative. The thought of more live entertainment in the Redding area is a plus as well. I was excited you are talking about an Amphitheater. I do know you will do the right thing, in the concerns of the citizens with traffic and streets ect. or at least work with City of Redding in getting Safety Concerns dealt with.
As for some people they are saying no on the Casino, for the drug trade that happens in or around the Casino that happens now, but no where in Redding or other cities are any safer or different in this same situation, we can't blame the Casino, heck I see drug deals happening just off the school campus, or baseball fields, movie theaters. We can't put the blame on WR for this. Just understand we are in support of this move and building another Casino.

I60-01

Sincerely,
Denal & John Jurin

Comment Letter I61

From: **Marge Riffel** <mmriff@live.com>
Date: Wed, Jun 12, 2019 at 6:39 PM
Subject: [EXTERNAL] DEIS Comments, the Redding Rancheria project
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

Dear Chad Broussard, BIA:

I do not want Win River Casino to build on the property with I-5 visibility at S. Bonnyview. A casino will further impact the traffic congestion that is awful now and will worsen with the upcoming Costco and shopping center additions. I61-01 I61-02

The environment and animal habitat will experience unrepairable damage. It should be a park or open space.

Rolling Hills with I5 access is close enough. Win River is fine with their current location. I61-03

Sincerely
Marjorie Riffel
1513 Riviera Dr.
Redding 96001

Comment Letter I62

From: **Mimi Ramsey** <mjrbdr@aol.com>
Date: Wed, Jun 12, 2019 at 7:18 PM
Subject: [EXTERNAL] Win River
To: <chad.broussard@bia.gov>

Chad,
Couldn't win river make a frontage road. Then you could have a road off of I5 go under the bridge instead of up on bonnyview rd. You could have a road going up to the hotel by Burger King to go out to bonnyview rd. But as when you exit the I5 going south, you could have two roads going down the bridge one to the casino and one to go to I5.
Chad May I talk to you more about this please to explained better

I62-01

Mimi Ramsey
530-524-7700

Sent from my iPhone

Comment Letter I62

From: **Mimi Ramsey** <mjrbdr@aol.com>
Date: Fri, Jun 14, 2019 at 3:39 PM
Subject: [EXTERNAL] Suggestions
To: <chad.broussard@bia.gov>

I notice people are complaining about noise of the amphitheater's??
I proposed putting a sound board wall or fence so the nearing neighbors don't hear.
Also neighbors are requesting a high fence around the back to have their own privacy from Win River if possible

I62-02

Sent from my iPhone

Broussard, Chad <chad.broussard@bia.gov>

[EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project

1 message

Anne Thomas <athomas@shastalivingstreets.org> Thu, Jun 13, 2019 at 8:02 PM
To: chad.broussard@bia.gov

Thank you very kindly for the opportunity to provide input. See the attached letter.

Shasta Living Streets offers comments on behalf of our members, partners and community. We do not support this project as currently proposed, given the major safety, health and equity issues due to lack of transportation choice in/out/and approaching this major entertainment and commercial center that seeks to serve all people in our community for long into the future. I63-01

Today Shasta County has unacceptably high rates of debilitating health outcomes directly related to inactivity, and highest levels of pedestrian death and bicycle collisions. Our families also face an exceptionally high cost of transportation since there is no other choice but to drive for every trip. This high cost and lack of transportation choice destabilizes families, leads to poor health, and drives talented young people and retired couples to seek another place to live and play. Leaving our families stressed, our businesses without the employees they need, and our economy at risk.

Creating convenient and safe bicycle networks and walkable routes to all business and entertainment centers in our community is essential to help reverse alarming negative social indicators related to health and income in Shasta County, by creating an environment for individuals and families to live daily active lives and reduce transportation costs. I63-02

Best,
Anne

Anne Wallach Thomas, Director

athomas@shastalivingstreets.org | 530 355-2230 | shastalivingstreets.org

Shasta Living Streets builds prosperous communities by creating better bikeways and trails, walkable cities and vibrant public places where active living excellence brings a strong and secure economy and enables all people in our region to lead healthy and joyful lives. ~ Your support makes our success possible. please join us!

LivingStreets_RancheriaCasino_June2019.pdf
256K

Shasta Living Streets

Better bikeways, trails, walkable cities and vibrant public places

July 15, 2018

Amy Dutschke, Regional Director, BIA, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

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

Re: **Major safety, health and equity concerns regarding access for all residents and visitors in our community, biking and walking**
Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project

Shasta Living Streets offers comments on behalf of our members, partners and community. We do not support this project as currently proposed, given the major safety, health and equity issues due to lack of transportation choice in/out/and approaching this major entertainment and commercial center that seeks to serve all people in our community for long into the future. I63-03

This project plan and the assessment of the EIS fail in these ways

- **Underestimates the negative impact to the safety and health of people accessing the site and activities when walking or biking**, including the necessary use of nearby streets and across busy intersections to access the site. These intersections and roadways will experience much heavier traffic volumes as a result of the project.
- **Fails to provide adequate options for people accessing the site walking** or biking to and from the proposed development. We expect many employees and customers to the site would rely upon, and benefit from bike/walk access. I63-04
- **The Traffic Study and EIS do not reference current city and county goals and strategies for improving walking and biking infrastructure and amenities.** References are to outdated bicycle / active transportation plans.

allthomas@shastalivingstreets.org | 530.355-2230 | shastalivingstreets.org

Why this matters

Today Shasta County has unacceptably high rates of debilitating health outcomes directly related to inactivity, and highest levels of pedestrian death and bicycle collisions. Our families also face an exceptionally high cost of transportation since there is no other choice but to drive for every trip.

This high cost and lack of transportation choice destabilizes families, leads to poor health, and drives talented young people and retired couples to seek another place to live and play. Leaving our families stressed, our businesses without the employees they need, and our economy at risk.

Our community values active outdoor living.
Shasta Living Streets is a local organization dedicated to building better bikeways and trails, walkable cities and vibrant public places in Shasta County. We believe when we couple superior facilities for active transportation and public space with our existing world-class recreational attractions – we will ensure our region excels as a place for families and businesses to thrive and as a destination for visitors.

We believe making bicycling and walking safe, reliable and convenient for everyday transportation brings tremendous advantages – it allows families to be healthy and save money on transportation, makes more vibrant and connected communities, and supports local businesses by helping them attract customers, retain staff and attract tourists.

Clearly defined direction by the State of California, Shasta County and City of Redding call for increasing safety and connectivity for healthy active living and non-motorized transportation in new plans and projects.
Recent City and County plans are aligned to state direction and seek to put these goals into action. See list attached.

Great need in our community. Barriers to movement create disease. Shasta County has unacceptably high rates of debilitating health outcomes directly related to inactivity, some of the worst levels in the state. The latest County Health study prepared by the Robert Wood Johnson Foundation showed Shasta County ranks a low 56th of 57 for health behaviors, including obesity and physical inactivity rates higher than state average, and access to exercise opportunities significantly lower than the state average.

Traffic deaths are not accidents. Shasta County has the state's sixth highest rate of pedestrian death due to car crashes, and very high rates of death and life-altering injuries for people biking. We must design our development projects from the outset for safe access by all modes of transportation.

Disadvantaged community. Shasta county is considered a disadvantaged community by measures of income and unemployment. Safe access for people biking and walking is an equity issue in our community, as the cost of driving increases and not all people are able to drive for every trip.

I63-04 (Cont.)

I63-05

Currently adopted Active Transportation Plans should be followed

Relevant to Strawberry Fields Site (Alternatives A, B, C and D)

- **Go Shasta Regional Active Transportation Plan**, approved by Shasta County Board of Supervisors, March 2018
  - www.srta.ca.gov/286/GoShasta
  - The Recommended Bikeway Network (page 62) calls for a Shared Use Path running north and south through the proposed project site (eventually crossing the Sacramento River at the island).
    - **City of Redding's Parks, Trails and Open Space Master Plan** (2004) also reflects this multiuse trail along the river at the project site.
- **City of Redding Active Transportation Plan** (Redding ATP), April 2018
  - www.cityofredding.org/departments/development-services/planning (link at bottom of page)
  - Page 16 specifically outlines vision for South Redding (South Bonnyview Road) area with shared use paths.
  - Planned bicycle network outlined in the Redding ATP includes:
    - Buffered bike lanes and Shared Use Path along South Bonnyview Road (west of Bechelli).
    - Buffered bike lanes on Bechelli Lane (north of Bonnyview).
    - Shared use path along South Bonnyview Road (Bechelli Lane to Churn Creek Road).
  - Recommends pedestrian facilities that increase comfort and safety for people walking, with sample treatments (page 23). Designates Shared Use Path for South Bonnyview Road near Bechelli Lane.

I63-06

Relevant to Anderson Site (Alternative E)

- **Go Shasta Regional Active Transportation Plan,** adopted by City of Anderson, February 2018
  - www.srta.ca.gov/286/GoShasta
  - For roadways impacted by the proposed development, Go Shasta Pedestrian Plan recommends:
    - "Commercial / Civic Corridor" pedestrian treatments for North Street to improve walkability
    - Pedestrian improvements for intersections at both southbound and northbound Interstate 5 interchanges on North Street and on Balls Ferry Road, as well as pedestrian improvements at the intersection of Highway 273 and Market Street.
  - The planned bicycle network for Anderson includes:
    - Separated bikeway along North Street (McMurray to Highway 273)
    - Addition of bike lanes on Balls Ferry Road in proximity to the Interstate 5 interchange and on McMurry Drive.

Safe, connected routes need to be included for walking and bicycling to, from, and within this major business and entertainment development

The change in zoning from agriculture to commercial and entertainment uses that will have high visitation rates, and resulting increases in traffic, necessitates the provision of high-quality options for walking and bicycling to, from, and within, the proposed development. This will benefit employees, customers and guests, and neighbors.

With the change in zoning for the land proposed for development, the vision set and documented in the current local Active Transportation Plans should be followed and similar types of facilities should continue to, from, and within the proposed project area to ensure non-motorized connectivity from both the north and south.

Examples include, but are not limited to

- Strawberry Fields Site
  - Shared Use Paths or otherwise separated facilities for biking and walking should continue from South Bonnyview Road to the destinations within the proposed project.
  - Providing a Shared Use Path or otherwise separated facilities for biking and walking from South Bonnyview Road to Smith Road would provide safe options and improve the active transportation network for people traveling to the development. This should be provided regardless of which 'project access scenario' for motor vehicles is chosen.
- Anderson site
  - Provide a Shared Use Path or otherwise separated facilities for biking and walking from Riverside Avenue to the south end of the property at Oak Street, with connections to destinations within the development. At a minimum, provide a multiuse path link to the south end of Automall Road and add bicycle lanes on existing streets to Riverside Avenue.

I63-07

Shasta Living Streets staff and Advisory Group would welcome any opportunity to advise on biking and walking facilities or provide assistance or input to design more appropriate options for transportation choice in this project.

Creating convenient and safe bicycle networks and walkable routes to all business and entertainment centers in our community is essential to help reverse alarming negative social indicators related to health and income in Shasta County, by creating an environment for individuals and families to live daily active lives and reduce transportation costs.

Thank you very kindly for the opportunity to provide input.



Anne Wallach Thomas
Executive Director, Shasta Living Streets

BUILDING COMMUNITY PROSPERITY

Raising Redding and Shasta County into the ranks of top places for active and healthy living - brings benefits and builds prosperity

Strengthens local economy and makes our region thrive

In the new competition between cities for talent and business, our region's superior advantage can be lifestyle and active living. We can lead, follow, or lag behind. Young people and retired couples want to be active in their daily lives, not just on weekends.

Reduces local cost of place

Reducing cost of driving frees money for essentials and builds prosperity for families, young professionals and seniors. Shasta County families now face exceptionally high cost of transportation since there is no other choice but to drive for every trip.

Improves individual health

Barriers to movement create disease. Shasta County has unacceptably high rates of debilitating health outcomes directly related to inactivity, some of the worst levels in the state. By creating an environment for active lives, we reduce outrageous levels of obesity, diabetes and other activity-related illnesses.

Ensures public safety

Traffic deaths are not accidents. Shasta County has the state's sixth highest rate of pedestrian death, and very high rates of death and injury for people biking. By designing our streets for safe movement by people walking and bicycling, we join other regions that are successfully ending the epidemic of traffic deaths and serious injuries of recent decades.

I63-08

Creates civic engagement and empowers democracy

Culturally rich communities are built with vibrant, people-friendly public spaces that embrace diversity. These are public places that bring people together to see, meet, learn from and engage with each other. Helping more people be engaged, informed, and involved builds resilient communities.

Accelerates the transition to a low carbon world

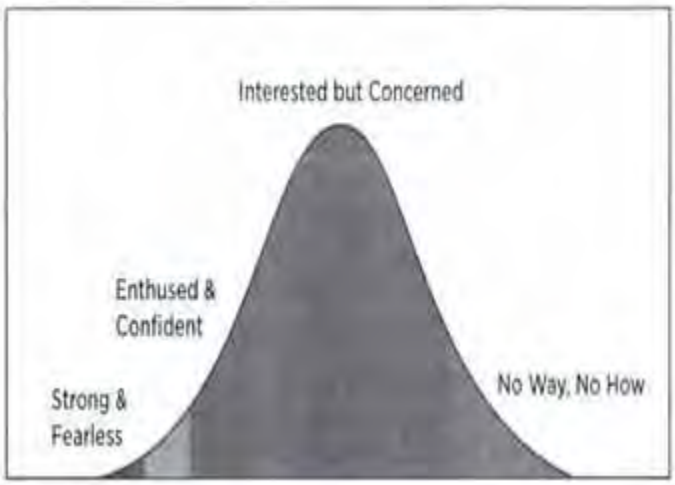
Pollution from transportation contributes 40% of the emissions that cause climate change. California policies are driven by the worlds most progressive climate legislation, and the state leads in resilience and mitigation responses. Major shifts are happening faster than people realize and results are showing, but transportation pollution is our biggest challenge and we must be bolder.

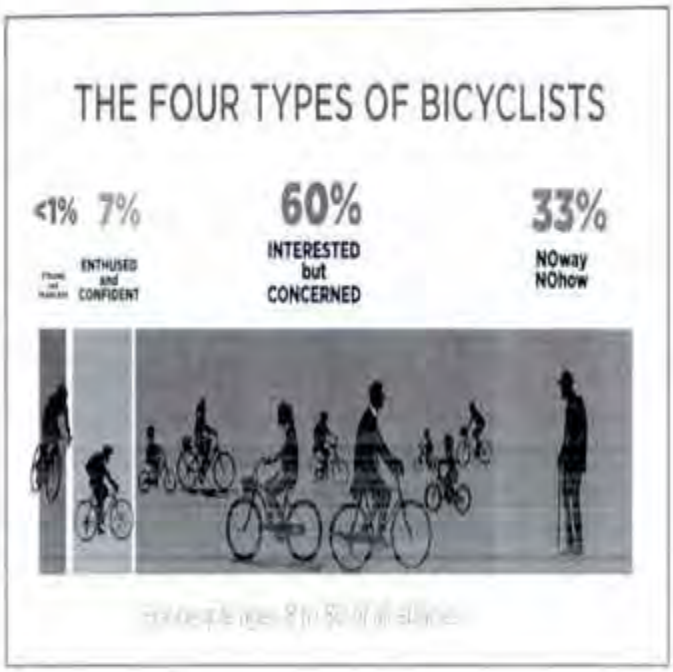
Shasta Living Streets

Let's Get Moving! Join Us Today!

WE NEED THE SIXTY PERCENT
for Economic Development, Community Prosperity, Low Carbon Resilience

We need the 60%





So, we have to build

Safe Bike Network of Prioritized Routes Connecting Homes & Activity Zones

The 60% Require a Trail-like Experience

OUT OF TRAFFIC
SAFETY AT INTERSECTIONS
COMFORTABLE, WIDE, SHADE
EASY HILLS
NO BREAKS

I63-08 (Cont.)

Provide Amenities, Create Community, Empower People

The 60% Respond to Amenities and Services

Safe bike parking, bike theft prevention
Bike station, route information
Education for safety and access
Tourism services, bike tours
Redding bike share
Connections to transit
Employer Incentives
Bike parks
Mt. Bike Trail System

Comment Letter I64

Bureau of Indian Affairs

Attn: Ms. Amy Dutschke

Pacific Regional Director

2800 Cottage Way

Sacramento, CA 95825

From: Mary Ocasion

19662 Osceola Ct

Redding, CA 96002

Re: DEIS Comments

Redding Rancheria Project

Redding Rancheria Fee-to-Trust and Casino Project

6-13-19

I have reviewed the information available in the DEIS regarding the proposed Redding Rancheria Fee to Trust and Casino Project.

1. The Waste Discharge plan is not adequate
   My concern is that an on-site sewage treatment facility will not adequately treat the waste and the result would be pollution of the ground water and the Sacramento River. A nine story hotel, casino and event center will generate too much sewage for an on-site waste treatment facility to adequately handle. I64-01
2. Storm Water runoff
   My concern is that the pavement will cause pollution of the storm water and the oily residue will cause pollution of the Sacramento River, Anderson Cottonwood Irrigation District facilities and adjacent areas. The other area of concern with the storm water runoff is with downstream flooding. I64-02
3. Loss of Class 1 and Class 2 Farmland
   The 232 acre site is currently zoned for agriculture and has been used for cattle grazing and strawberry production. Preservation of Agricultural land is very important in this area, as Shasta County does not have much of the prime farmland such as this available. This land is among the finest for production of food and fiber in Shasta County. I64-03
4. Rural Lifestyle and Aesthetics
   The lighting from this project is likely to cause the people living nearby to lose having darkness inside their own homes and for everyone within a few miles, the stars will disappear from sight. With the current zoning, those residents in the area enjoy a Country Lifestyle currently. They purchased their property knowing the zoning would not allow for a large development to change their homes and lifestyle. The public currently enjoys the open space and farmland views from Interstate 5 and the nearby roads. The noise from the proposed project is also a big I64-04

concern. Those who live nearby will hear sound coming from this proposed project, especially when events are going on in the amphitheater. These issues are not adequately addressed in the DEIS.

I64-04 (Cont.)

5. Impact to the Aquafir below Churn Creek Bottom
   Everyone who lives in Churn Creek Bottom uses well water from the Aquafir for sustaining their lives, households, ranches and gardens. A large development, such as this, could use more water, on a daily basis, than all the households and farms currently in Churn Creek Bottom combined. This could adversely affect ground level, causing sink holes, and building shifts, especially during a drought. During the most recent drought, several wells in the area went dry, as the current amount being used was more than what was available at the 35 – 50 ft stage. I am concerned about very large negative impacts in this area. The Native Americans all over the country have stood firm against the large oil pipeline that was set to go across land in North Dakota, impacting a reservation, for the water issues that they know could drastically effect their health and the health of the nearby river. The Ground water is life for those of us living in Churn Creek Bottom and the aquafir feeds the Sacramento River as well, which aides in the health of the salmon, other fish, wildlife and people living downstream.

I64-05

6. Global Climate Change
   The environmental Global Climate Change issues will need to be addressed. A large amount of pavement where once an agricultural piece of land was, causes more heat to radiate and the effects of the vehicles on the pavement bring the carbon levels up.

I64-06

7. Traffic
   This project "would generate a significant increase in traffic" which is not acceptable to those who use Bonneyview Road and the surrounding roads. This will negatively affect the day to day lives of so many people.

I64-07

Please put the health of this community first and deny adding this land to the Tribal Trust and deny this project.

Sincerely,

Mary Ocasion

(530) 524-0406

Cc: Chad Broussard@bia.gov

From: <mimi@moseleyfamilycellars.com>
Date: Thu, Jun 13, 2019 at 4:22 PM
Subject: [EXTERNAL] Redding Rancheria Support
To: <chad.broussard@bia.gov>

Dear Chad,

I am a business owner in Redding as well as a leader in our community. My husband and I stand in support of the new Redding Rancheria location and are excited for the number of jobs and revenue which will come to our community as a result.

The plans are beautiful. I was at the meeting a few weeks ago and was thrilled by all of the support for this effort. I did hear one person mention what an eyesore it will be. I drove by after the meeting and imagined the completed casino and hotel and I believe it will add beauty to the area. If one were to complain about an eye sore, I would challenge them to look across the street at I-5 Rentals. THAT is an eye sore.

I65-01

I am also on the board of Advance Redding which is over the Redding Civic Auditorium. Although the Civic's talent pull may be effected somewhat, I believe a rising tide raises all ships and the Civic will benefit from shows which have less capacity.

Please note my support for this effort.

Mimi Moseley

Mimi Moseley

Owner

Moseley Family Cellars

4712 Mountain Lakes Blvd #300

Redding, CA. 96003

530-229-WINE (9463) Tasting Room

408-315-9578 (Cell)

www.moseleyfamilycellars.com

Comment Letter I66

From: **Rick Ramos** <kalidude.ramos@gmail.com>
Date: Thu, Jun 13, 2019 at 4:38 PM
Subject: [EXTERNAL] New Win-River casino near river.
To: <chad.broussard@bia.gov>

Sir, I Richard Ramos fully suport the Redding Rancheria and there new casino near the Sacramento River. Other than a park a casino is the best use of this land.
All Californias owe this tribe of people so much.
Peace,
Richard (Rick) Ramos

I66-01



CHURN CREEK BOTTOM

HOME OWNERS and FRIENDS Organization
POST OFFICE BOX 492261
REDDING, CA 96049-2261
Facebook: Churn Creek Bottom Homeowners and Friends
Website: www.churncreekbottom.org

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

From: Churn Creek Bottom Homeowners and Friends
PO Box 492261
Redding, CA 96049
Re: DEIS Comments
Redding Rancheria Project
Redding Rancheria Fee-to-Trust and Casino Project

6-13-19

Ladies and Gentlemen,

Churn Creek Bottom Homeowners and Friends Organization is opposed to the Redding Rancheria proposed conversion of 232 acres of land to Tribal Trust for the purpose of construction and operation of a casino complex. Our concerns include but are not limited to the following areas:

- Conversion of Agricultural Land
- Loss of Rural Community Aesthetics
- Possibility of other non-agricultural development in Churn Creek Bottom
- Sewage Treatment Facility
- Negative Effect on the ground water for those who live in Churn Creek Bottom
- Global Climate Change
- The social and economic changes to the community due to gambling addictions
- Need for additional law enforcement resources
- Possibility of an additional freeway exchange at Smith Road

I67-01

We have a membership of approximately 200 households. Our Organization's Mission is to maintain the agricultural zoning and rural lifestyle enjoyed by our residents and the surrounding communities, as well as to preserve it for our future generations.
The 232-acre proposed development is at the Northwest corner of Churn Creek Bottom and is zoned A-5. It is classified as Grazing Land by the Dept of Conservation. For many years, Strawberries were grown on this land and more recently the land has been grazed by cattle. Agricultural land serves the community in many ways, allowing the production of food and fiber and creating a Rural Aesthetic appearance. As people drive North on I-5, they have an opportunity to see the entrance to Redding as a beautiful open space, with wildlife and cattle. If this development is allowed, the entrance to Redding will be a casino and a large paved area with multiple buildings. We are opposed to this loss of Agricultural Land and Loss of Rural Community Aesthetics. Paving over and building on Prime Agricultural Land would destroy an irreplaceable natural resource and cause an increase in Global Warming by providing a surface that absorbs the sun's heat and by reducing the absorption of rainwater by the soil, thus also contributing to flooding and erosion downstream.
Additionally, with development, comes the risk of other non-agricultural development in Churn Creek Bottom.

We are concerned about the ground water for those who live in Churn Creek Bottom and the effect this development will have on the ground water.
We are concerned about having a sewage treatment facility on this parcel, for a large development, such as they have proposed. We believe that even with a sewage treatment facility, the ground water and the Sacramento River will be polluted. Problems at the TA Truck Stop, regarding their sewage treatment facility, have occurred several times.
We are concerned about the project's negative effect on Local Pollution and on Global Climate Change.
We are concerned about this project's negative effect on the social and economic changes to the community due to gambling addictions.
We are concerned about the increase of crime brought by any casino and about the resultant need and cost for additional law enforcement resources. We have many homeless people and many people with addictions in this very rural area, which would only become more of a problem with the known problems caused by casinos.
The Traffic would become unbearable for the area, the noise and lighting would ruin the peaceful country aesthetics for the families living nearby.

I67-01
(Cont.)

We have concerns regarding the tribe's purchase of this land and converting it to Tribal Trust Land, thereby allowing the Tribe to build a casino. It is our belief that the allowance for Tribal Gaming should not apply to land purchased by a Tribe and converted to Tribal Trust Land.

We incorporate by reference the comments of both the Speak Up Shasta Association and the Paskenta Band of Nomlaki Indians. We also agree with those who spoke in opposition to the project at the 5-20-19 Public Hearing.

We are against the land being converted to Trust Land. We are against a casino and its accompanying development of commercial and retail activity on Prime Agricultural Land.

Sincerely,

Tom Reemts
(530) 365-6579

Cc:Chad.broussard@bia.gov

From: **Annette Littier** <4alittier@gmail.com>
Date: Fri, Jun 14, 2019 at 10:42 AM
Subject: [EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project
To: <chad.broussard@bia.gov>

Dear Mr. Broussard,
I attended the meeting in Redding May 20th, regarding the proposed Casino site but was unable to make a comment. I have chosen to submit one this way.

I am a long-term resident of Redding and a 13-year resident of Churn Creek Bottom. We are creating a homestead for our family and appreciate the rural quality of life while being closely connected with the city of Redding.

While I appreciate the needs of the Redding Rancheria, I also have grave concerns about a number of areas of impact:
1. The proposed location is prime agricultural land. I have lived in other areas of Redding and the quality of the river-loam soil in Churn Creek Bottom, and especially along the river, is a valuable resource for our city and community. To use it for any other purpose seems short-sited and deeply impacting. I68-01

2. We live down-river only a couple of miles from the proposed location. We are part of the ACID Irrigation district and use diverted Sacramento River water for irrigation of land and livestock. I am concerned that pollution from the casino and the impact of such a high degree of development and population will impact the quality of our water. Pollutants deposited in our land from irrigation water could impact crops and livestock all along the ACID system. I68-02

3. Besides ACID for irrigation, we are also dependent on underwater aquifers for our well-water. I am concerned that the quality of our drinking water, thus impacting our quality of life, would be impacted by pollutants of this high degree of development.

4. The proposed open-air amphitheater would contribute to noise pollution as we are already aware of this issue living near to the Anderson Fairgrounds, Hwy 5, and the train tracks. No more noise is needed! I68-03

5. Because of the 24/7 nature of casinos, lights from the parking lots and the casino itself would create light pollution in an area that desires to be rural in nature. I68-04

6. With two new shopping centers proposed for the SBonnyview area, the addition of the casino would make the entry-point to Redding a nightmare for traffic! The other option of accessing from Smith Road or another area of Churn Creek Bottom again turns residential land and neighborhoods into heavily trafficked access points. I68-05

7. And how will this development impact the local business community? Local hotels, retail, the Civic Center, will be deeply impacted as the casino becomes the newest and brightest attraction. I68-06

We already have an abundance of empty retail space throughout Redding…we need to support existing businesses, not build competing ones.

I68-06 (Cont.)

8. Has and study been done on the social impacts that a casino located on Hwy 5 creates regarding issues like human trafficking, prostitution or other undesirable behaviors associated with the casino industry? Are these impacts considered? It is of grave concern for those of us that call Churn Creek Bottom and Redding our home.

While I honor and respect the Native People groups and their heritage in this land, I also know that this development is not the heart of the local Wintu tribe or how the native people would have honored the land. I hope that great consideration will be given to this matter and its far-reaching impact on our land, our community and our lifestyle.

I68-07

Thank you for your consideration in this matter.

Sincerely,
Annette Littier
19186 Knighton Road
Redding, CA 96002

DEIS Comments on Proposed Redding Rancheria Fee-to-Trust Casino Project

From: Gary Bossuot
4888 Sunnyhill Ln
Redding, CA 96002

I am a homeowner of property adjacent to the Strawberry Field site and wish to voice my strong opposition to the proposed Strawberry Fields project.

Land Use & Zoning

The subject property is agricultural land and abuts property zoned residential. In the past, another proposed commercial development on the east side of Interstate 5 was rejected by the voters. Similarly, the current proposed project is inconsistent with the surrounding area land use. The residential area immediately to the north of the Strawberry Fields is now surrounded by land owned by the tribe. The overall negative effects of the project can be expected to diminish the desirability, quality of life and value of the residential properties. The are no mitigation solutions offered to the homeowners. The project appears to not be consistent with the City of Redding General Plan.

I69-01

Traffic

The proposed project calls for a four-lane road with a sidewalk from South Bonnyview Road to the Strawberry Fields. While the Rancheria currently owns land which could provide a part of this expanded roadway, they would need to reduce the size of the parking lot at their Hilton Garden Inn and obtain a right of way from the City of Redding (Sunnyhill Pumping Plant) and the adjacent residential property owner in order to complete this road. Otherwise the road will be narrowed to a two-lane road entering the project. The DEIS doesn't address how they can expect to construct this road.

I69-02

Even during the non-commute hours, the South Bonnyview Road and Bechelli Lane intersection is always busy. The proposed Costco shopping center on the North-east corner of this intersection will further strain the traffic flow. Solutions to alleviate this traffic congestion appear inadequate and the Rancheria's proposed development will only exasperate the problem. A tremendous amount of new traffic will be funneled through an already inadequate road infrastructure. Left turns from South Bonnyview to the project would be problematic as there is no room to expand the left turn lane. Access for emergency vehicles could be limited. The DEIS doesn't address the upgrades needed and their cost and whether the tribe would pay for any of it.

Noise/Lights

There appears to be little or no real consideration of the effects on the adjacent residential property. Although the Strawberry Fields consist of 232 acres, the project is inexplicitly planned to be built right next to the neighboring residences instead of further to the south. A fence along the northern side of the property will have little effect on the lights from the structures, especially a multi-story hotel.

I69-03

Improper Use of Fee-to-Trust

My understanding that the use of a Fee-to-Trust transaction with the Bureau of Indian Affairs is to allow tribes to build and operate a viable gambling operation on land outside their reservation

I69-04

when their tribal lands are remote and not conducive to such activity. The Redding Rancheria has an established and successful gambling operation. Based on the ongoing expansion of the existing casino, entertainment center, two hotels, a gas station/mini-mart and several medical facilities as well as the financial stipend paid to tribal members, it appears that their present operation has and continues to generate a significant cash flow for the tribe with no evidence to indicate that it will not continue to grow. Thus, there is no economic justification for the tribe to move the casino and ancillary operations to land outside their present site. Further, if the tribe wanted to establish the proposed project (hotel, restaurant, retail, entertainment venue) without the casino, they could do so without the Fee-to-Trust vehicle but would be subject to all zoning, building and environmental requirements that any non-tribe would face.

I69-04 (Cont.)

Crime

For whatever reason, the existing casino has been a magnet for criminal activity based on the number of calls to law enforcement for assistance. There is no evidence given in the DEIS that this criminal activity would not occur at the proposed casino and would not affect the neighboring residences.

I69-05

Infrastructure

While outside the Redding City Limits, the Strawberry Fields project would rely on city water, sewer and power services. The is no Memorandum of Understanding between the City and the tribe as to whether the City is willing to provide these services and at what cost. These negotiations should have been completed prior to the completion of and included in the DEIS.

I69-06

Non-gaming Activities

The Strawberry Fields property is not zoned for the proposed hotel, restaurant, retail and entertainment venues. The DEIS does not address the impact on existing competing businesses or the loss of property tax revenue.

The DEIS paints the project with broad brush strokes and is lacking in detail as to the many environmental, economic and social impacts it will cause. And by not adequately identifying these issues, the mitigation of same it lacking.

I69-07

I encourage the Secretary to find the DEIS inadequate and reject all of the proposed projects for the Strawberry Fields location.

Comment Letter I70

From: <rev21@startmail.com>
Date: Fri, Jun 14, 2019 at 3:12 PM
Subject: [EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project
To: <chad.broussard@bia.gov>

Chad,

These are my concerns regarding this project.

I've been a resident of Redding since the late 70's. My wife and I own several acres in the beautiful Churn Creek Bottom area. I love northern Calif and it's beauty which is the primary reason for my concern. I love the Indigenous people and have nothing against them. If they love the land like they say they do then why would they want to place an ugly, monstrous building complex at the entrance to Redding next to the beautiful Sacramento River? Their primary motivation appears to be money. This complex would compromise the wildlife, ruin the natural beauty, cause traffic congestion, add pollution from the parking areas with water runoff from oil and other chemicals from vehicles, place inebriated drivers on the road, add the risk of sewage contamination to mention just a few concerns. This complex belongs in an area like where the current Casino is located. An expansion of the current Casino would be a much better option.

As I understand, this project would not bring tax revenue into the city, contrary to what many believe. Many projects similar to this are stopped in their footprints through legal action based on environmental impacts to certain species of animal and insect life. Unfortunately, this doesn't seem to be happening in this case, perhaps due to lack of funds to fight this project? I70-01

Many residents in this area will be negatively effected by this Casino project due to the issues listed above, and more. Many of these folks voiced their concern at the recent meetings in Redding.

Please consider the negative impact this project will have on this community.

Regards,

Glen Harmer

530-262-1315

From: **Mark Coulter** <blackjava1@yahoo.com>
Date: Fri, Jun 14, 2019 at 10:13 AM
Subject: [EXTERNAL] DEIS Comments, Redding Rancheria Fee-to-Trust and Casino Project
To: <chad.broussard@bia.gov>
Cc: Todd Giles <todd@tgilesinsurance.com>, Shannon Giles
<Shannon_Giles@progressive.com>, Gary Bossuot <gbossuot@aol.com>,
<bryancrum11@gmail.com>, <karencrum64@gmail.com>, <hwdaniell@aol.com>, Janet
Coulter <janetleecoulter@hotmail.com>

From: Mark Coulter
PO Box 494847
Redding, California
96049
Phone number -530-524-3945

Dear Mr. Broussard
Thank you very much for taking the time to carefully look over these comments and Concerns.
I am firmly against the building of a Casino and amphitheater, On the Strawberry Fields property.
A hotel or retail. (as long as the hotel is not nine stories) would be more conceivable.
My home presently is approximately 1000 feet from the proposed development.
And I think it's a reasonable conclusion to say that the following negative consequences, will definitely affect the quiet enjoyment of my property. I71-01

1. Traffic-The proposed ingress and egress go right past our driveway-so will go from a few car trips past the front of our driveway per day, to literally thousands. I71-02

2. Crime- according to their own statistics there's no question that one of these casinos in your neighborhood dramatically increases criminal behavior and crime. I71-03

3. Homelessness-unfortunately, there are a lot of poor souls who get a small stipend from either disability, SSI or some other government agency. These people often don't have a home or even a car but are so addicted to gambling they walk down to the casino to
Lose money they should be buying food, shelter, even clothes, with.
also it seems like a large subset of people in this situation have other compulsive behaviors like, drug addiction, alcoholism,
That causes them to have no respect for themselves, their own property, or anyone else's for that matter. I71-04

4. Loss of real property value- I don't believe it's an exaggeration to say that, if this casino is approved and built as proposed. I can expect a six-figure plus loss of property value, due to the deleterious effects of having the casino and ancillary businesses as neighbors. I71-05

5. Pollution- noise pollution being the main one-followed up by air pollution and light pollution. I71-06

Also, the Redding rancheria already has a casino and hotel, they seem to have plenty of money to buy fire trucks for the city of Redding and to pay for community service officers, And miscellaneous other things, that have an appearance of buying influence.
Not saying that the rancheria hasn't done any charitable acts, they have, however some of these, seem to be "quid pro quo"

I haven't really heard or seen of any pressing need why this monstrosity needs to be built at the southern approach to our city and entrance to national Forests, and Lassen national park .

It's my understanding that the Rancheria and all tribes for that matter, that are classified as a sovereign nation, work under different tax rules than normal businesses that issue stock and are owned by shareholders. So city coffers are not going to be helped by this development, no transient occupancy taxes at the hotel (no sales taxes?). No property taxes, so the Shasta county is not going to be helped by this development. I71-07

But very likely this development will be an additional burden on law-enforcement and certainly social services.

In conclusion if we knew (which you probably do) how many families that are members of the Redding rancheria,that are going to get "increased income" (maybe) versus how many Families are going to have the quality of their life degraded. The decision should be pretty easy to make.
Thank you for your consideration of the above , sincerely Mark Coulter

Sent from my iPhone

Comment Letter I72

From: **Marylin Meissner** <marylinmeissner@gmail.com>
Date: Fri, Jun 14, 2019 at 4:20 PM
Subject: [EXTERNAL] Win River relocation
To: <chad.broussard@bia.gov>

Dear Sir, PLEASE consider how forever damaging this relocation would be to the natural habitat for our wild animals and birds that live along the Sacramento river. I have lived in the bonny view area since 1979. This town is so short sided with no vision, and continue to make a mess over the city. I saw the Dana Drive Mall go up, such a waste .cost co is well suited for Redding where it is now, by increasing the hours of operation there is no need to tear up paradise and put up another parking lot. NO on the Casino move .marylinmeissner@gmail.com

I72-01

From: **Noah Megill** <megillnoah@gmail.com>
Date: Fri, Jun 14, 2019 at 1:54 PM
Subject: [EXTERNAL] DEIS Comments, Redding Rancheria Project
To: <chad.broussard@bia.gov>

In regards to politics, I prefer to remain neutral. In regards to matters in my community, I often find myself remaining silent. In regards to points of environmental concern, I allow my mood to take a sorrowful tone and then move on. But in regards to the Redding Rancheria Project-- I will not remain neutral, I refuse to be silent, and I am encapsulated by a fury I have never before experienced.

This project is unnecessary to its very core. At the expense of 200+ acres of natural beauty, hurting locally owned and operated businesses, and putting species that are already registered through state and federal government as either threatened or endangered at further risk, there lies a plan to in favor of absolutely nothing this community doesn't already possess. The concept of a group of individuals who hold the values of their ancestors in the highest regard, only to seek to irrevocably ravage so much land in favor of monetary greed is tragically laughable. This plan spits in the face of the core values of those ancestors. I am sickened at the thought of such pristine natural land being massacred for establishments this community not only doesn't need, but already has-- it sickening.

I cannot, will not, and shall not, ever be able to conceive any way in which I will ever remotely be in favor of this project. When I speak of logistics to those in favor of the project I'm ALWAYS met with an attitude composed of nothing more than an organization that wishes to throw its weight around under the guise of some perverted view that a debt to them is owed by the federal government for actions and events that occurred over 100 of years ago-- that because of what white ancestors did to native ancestors many generations ago, the present generation has some sort of bill to pay. So here we have is a project that promises to negatively impact the area in multiple respects– but hey, at least it would mean a tally mark for those of native american descent. And that's another tragic part of the view offered by those in favor of this project. It is brought up in an "us vs them" context. As though this weren't a matter of one community hefting the burden of a pointless undertaking. It's always "Support the tribe". those in favor freely advertise that the interests of the community are at the very least a second thought.

Chad, all I can do at this point is plead with you and the Bureau to not allow for this project to be approved. I've lived in Shasta County my entire life. I know this place, I know these people. And I promise you, this is not what's best for either.

Hoping against hope,
Noah Megill

I73-01

From: **Pam Harmer** <pmh1ski@gmail.com>
Date: Fri, Jun 14, 2019 at 3:04 PM
Subject: [EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino project
To: <chad.broussard@bia.gov>

Chad Broussard, EPS
Bureau of Indian Affairs

RE: Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino project

From: Pam Harmer, 7333 Waterside Wy, Redding, CA 96002 pmh1ski@gmail.com

There are numerous reasons why the proposed project off the Bonnyview exit in Redding should be denied. There are a few benefits as mentioned at the meeting on May 20, 2019, which do not outweigh the negative impact it will have on the neighboring communities as well as the city of Redding.

This project would be a travesty to the surrounding neighborhoods which is made up of several homes in various subdivisions and homes on farmlands and ranches. People live here for its beauty, fertile soil, safety, peace and quietness. To put in a casino at this proposed location would diminish these benefits for those currently living here with the added crime, traffic, noise, lights, increased risk of encountering impaired drivers, etc.

If the Redding Rancheria is truly concerned for our community, they would not be proposing this project in an area that would negatively affect the families who live in the surrounding areas of this proposed project. Should this casino be approved at this location, current residence would have to endure a decreased quality of life at their homes; and moving away may not be an option for them as they will most likely experience decreased home values since it would become an undesirable place to live. There is a reason why casinos, in general, are built away from thriving neighborhoods. I74-01

The above concern is in addition to the concerns presented at the meeting on May 20,2019, such as:

*Violates Redding's General Plan
*Threatens Numerous Wildlife Species
*Destruction of Native Plants in the Area
*Increased Traffic in general and study ignores impacts to rush hour traffic
*Noise and Light Pollution
*Flood Threats not addressed
*Additional Costs to Redding and Shasta County

*Negative Impacts to Local Businesses

Yes, the Redding Rancheria does contribute to various community needs, as do a host of other organization in this area. However, putting a casino in this proposed area with all the negatives it brings far outweighs any good the Redding Rancheria could provide. Casinos are costly to the community.

Its like the tobacco industry, although they make numerous monetary contributions to communities, does it justify the cost of peoples' lives?!

I74-01
(Cont.)

I understand the Redding Rancheria can expand at their current location, which would be a wiser chose if truly considering concerns for the environment as well as the Redding and Shasta County communities.

I thank you for considering the concerns mentioned above before making your final decision.

Comment Letter I75

From: **Rod Dole** <sales@harrisonsmarine.com>
Date: Fri, Jun 14, 2019 at 11:16 AM
Subject: [EXTERNAL] Winn River BIA, complaint
To: <chad.broussard@bia.gov>

I am a outdoor retailer, in the Redding area and have a complaint regarding the casino being able to compete with private business, since I am not able to compete with them? With as small, of an population that we are drawing from, the only way they will be able to bring a large outdoor retailer is if they give the space away or for a large discount. I have never seen a casino that gets to compete with other small businesses and it should not be allowed.
Besides they are trying not to expand the road infrastructure and that does not seem fair either. I tried to Contact the Casino and Gary Hayward with my concerns and they refuse to talk to me.

I75-01

Thanks Rod Dole

Harrisons marine and RV

From: **Walt Cole** <1935rainbow@gmail.com>
Date: Fri, Jun 14, 2019 at 10:07 PM
Subject: [EXTERNAL] Draft EIS comments,Redding Fee-to-Trust and Casino Project
To: <chad.Broussard@bia.gov>

I object to the Casino project because of the additional traffic problem that it would cause at the I-5/ South Bonneyview Overcrossing. Costco, In & Out Burger along with other small business are going to locate there, so there is no way that the intersection can handle the additional Casino traffic.

I76-01

I drive through that intersection every day and there existing traffic backups.

The best way that Casino traffic could be handled, is to build on and off ramps for the Smith Road overcrossing and not provide access from the South Bonneyview/ I-5 overcrossing.

Walter Cole
Redding, Cal.

Comment Letter I77

From: **Bruce Armstrong** <batiger911@outlook.com>
Date: Sat, Jun 15, 2019 at 4:32 PM
Subject: [EXTERNAL] Win river casino
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

I oppose this project on many grounds. First is the traffic issue, second the environmental issue, third is the congestion surrounding this place, and fourth is the crime increase and all of the tax payers in Redding having to pay to police these issues. I77-01

I don't see this as positive for our city and county.

Bruce Armstrong

Comment Letter I78

From: **Cade Wright** <cdw22009@gmail.com>
Date: Sat, Jun 15, 2019 at 9:12 PM
Subject: [EXTERNAL]
To: <chad.broussard@bia.gov>

Keep it up! Don't let them bully you guys! If they want to get upset about taxes, how much church land is there not paying taxes???

I78-01

Comment Letter I79

From: **Hannah Littier** <hannahug4him@icloud.com>
Date: Sat, Jun 15, 2019 at 2:12 PM
Subject: [EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project
To: <chad.broussard@bia.gov>

To whom it may concern,

I have lived in Shasta County since I was ten years old. Before that, my family would frequent Redding as we came through to visit family. In all of these years, one of my favorite things about Redding has been its open spaces, trees and a city-wide awareness of our impact on and responsibility to care for and enjoy this beautiful land around us.

I was horrified to hear about the Rancheria Fee-to-Trust and Casino Project Proposal and am writing to voice my deepest concern, in junction with others, with the hope and desire to prevent this project from being approved or constructed.

I79-01

Here are a few reasons why I am firmly against this project:

First, it makes a huge statement of the value system of Redding, AT THE MOUTH OF OUR CITY. When bringing many international visitors to Redding, they often comment at the beauty and "untouched" nature of the very spot this project is proposed to be built upon. With a stunning view of the river and Trinity mountain range, it would be catastrophic to build such a distracting and environmentally unfriendly project on this beautiful gateway into our city.

Second, I personally believe this project would present an economical threat to the city of Redding. With so many small business in their infancy, and rebuilding of the PREEXISTING buildings and businesses in Redding after the Carr Fire, this Casino would potentially attract customers who would otherwise be contributing their finances to the businesses already in operation or just beginning to thrive.

I79-02

Finally, the Rancheria Fee-to-Trust and Casino Project would completely change, not only the flow of traffic at the entrance to our city, but also negatively impact the climate with pouring tons of asphalt and concrete, light pollution and threaten the ecosystem of a CURRENTLY THRIVING gateway to our beautiful city.

I79-03

Please consider not just the economic future of one party, but the well-being of the whole city and this beautiful land we all call home.

Thank you for your time and consideration in this matter.

Sincerely,
Hannah

Comment Letter I80

From: **jodyclack65** <jodyclack65@gmail.com>
Date: Sat, Jun 15, 2019 at 5:57 PM
Subject: [EXTERNAL] Jody Clack 1635 Garden Ave Redding Ca 96001
jodyclack65@gmail.com
To: <chad.broussard@bia.gov>

The Cassino is doing great where it stands. I moved here because it's quite. Redding has enough of it's own crime problems.we sure don't need to invite anymore crime. As it is Redding doesn't have enough police, firefighters,Emt, nurses,,,,(sorry if I left any one out. There are so many of you that help and SAVE us) that are over work and underpaid. We can not afford it. Don't desterb things

I80-01

Sent from my Verizon, Samsung Galaxy smartphone

From: **John Donoghue** <randogg23@sbcglobal.net>
Date: Sat, Jun 15, 2019 at 8:38 AM
Subject: [EXTERNAL] DEIS COMMENTS, Redding Rancheria project
To: <chad.broussard@bia.gov>

To whom it may concern,

I just wanted to express my disapproval of Redding rancheria's project to move to the Bonnyview I5 area I feel this will negatively affect the entire surrounding area if you look at the surrounding area at the existing casino you'll understand what I am talking about, all of the homelessness, crime, drugs and prostitution That goes on down there and along the creek is going to move up to this area! And will travel into the surrounding neighborhoods near and far, I'm not sure what the casino does now to curb the blight they have created surrounding their casino but it doesn't look like much! If you put a casino in this area the surrounding parks in the nearby neighborhoods are going to be overrun with these issues! The boat launch, parks off bechelli and churn creek on the east side of i5 extending into enterprise park are going to become havens for transient and homeless activities! WE DONT WANT THIS IN OUR AREA! WE LIVE HERE AND OUR CHILDREN AS WELL! Leave the casino where it is! They are all making enough money down there running a business that negatively impacts the entire area and i don't believe they care! Its all GREED! More money! How about they spend their money cleaning up the problems they have already created on 273?

I81-01

Sincerely
John Donoghue

From: **Mary O'Grady** <maryog7@hotmail.com>
Date: Sat, Jun 15, 2019 at 5:19 PM
Subject: [EXTERNAL] My Blessings
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

I don't live nearby your new projects land but i read today about opposition to building out by Bonneview or Churn Creek Bottom area. i am ok with whatever you do because I like your Redding Rancheria Casino, and shows although I haven't been there in a few years myself because I am older now in my 60's with health issues, and little money to come gamble it away but i would like to visit the new place you create if possible when its finished. If you get stopped from that land choice it would be real nice to have you build near me on Oasis Rd or off I5 interstate as I live on Lake Blvd between Oasis Rd and Pine Grove. I could drive easier to there in the dark rather than the dangerous freeway trip or back roads down Highway 273. i have a girlfriend near me here who would accompany me also I'm sure for dinner or show. thanks, and blessings on your new business venture. You deserve it very much.
Mary O'Grady

I82-01

Get Outlook for iOS

Comment Letter I83

From: **Conni Kerr** <ckerr57@gmail.com>
Date: Sat, Jun 15, 2019 at 2:31 PM
Subject: [EXTERNAL] New Win River Casino
To: <chad.broussard@bia.gov>

We would like to add our objection to where the new WinRiver Casino is proposed to be built. We do not live near the proposed site, so our objection is building on prime agricultural land. Even if the land is not used for that at the current time, it is like having money in the bank. As the population grows so must our ability to produce more food, so we need to preserve what prime food growing land that remains, and quit paving over it! While we understand Win River wanting to be more accessible, maybe they can work out a deal with another landowner in the area (possibly government-owned land?) a trade so the farmland can be preserved and they can make their bigger better and more accessible casino. But in any case, we are against the proposed site. Thank you, Paul and Conni Kerr, 2108 Darsha Ln., Redding, Ca 96003

I83-01

From: **Timothy Brown** <timwbrown@yahoo.com>
Date: Sat, Jun 15, 2019 at 6:27 AM
Subject: [EXTERNAL] Casino relocation
To: <chad.broussard@bia.gov>

I am a resident of Shasta County. I am 100% FOR the move. In my opinion the Casino income should more than double and what Win-River does for the community will also double. I84-01

Not into puns but I see the move as a Win-Win.

Tim W Brown

Sent from my iPhone

Comment Letter I85

From: **David Williamson** <david@davidwilliamsoncpa.com>
Date: Sun, Jun 16, 2019 at 6:35 AM
Subject: [EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project
To: <chad.broussard@bia.gov>

Chad,

We have been residents of Redding and Palo Cedro for the past 19 years. We love northern California and its beauty which is the primary reason for our concern. The proposed casino at the south end of Redding between I-5 and the Sacramento River will permanently mar this beauty. This complex would compromise wildlife, ruin the natural beauty, and add an enormous amount of traffic congestion at an already overcrowded freeway exit/overpass. This complex belongs in an area like where the current Casino is located. An expansion of the current Casino would be a much better option. I85-01

We believe this project requires a lot more study before it should be allowed to move forward – the impact to this area will simply be too great to rush a project of this magnitude. We ask that you at a minimum hold off on approving this project until more study can be done into its true impact.

Thanks,

David and Donna Williamson
2400 Washington Ave.
Suite 300
Redding, CA 96001
530-244-6300

Comment Letter I86

June 16, 2019

Amy Dutschke, Regional Director, BIA, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

RE: **Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project**

Dear Ms. Dutschke,

I am sending this letter to voice my opposition to the Redding Rancheria's (Tribe's) proposed 232-acre Fee-to-Trust and Casino Project in unincorporated Shasta County, California. The Proposed Action consists of the following: 1) the transfer of seven parcels totaling approximately 232 acres from fee to trust status; and 2) the subsequent development of a casino resort and associated facilities. I offer the following points for your consideration.

- I don't believe our community needs expanded gaming facilities. I believe adequate gaming facilities and gaming opportunities currently exist.
- I question the Tribe's assertion that expanding their gaming is needed to meet the economic needs of the Tribe.
    - My understanding is that this Tribe has a relatively modest size membership. Does not the existing casino/hotel/spa and event center along with their gas station/mini mart, freeway frontage hotel and other business ventures meet the economic needs of the Tribe?
    - I certainly don't have anything against the Tribe's (or any other person or company) interest in bringing in more revenue but question why this fee to trust is needed and thus at taxpayers' expense?
- I acknowledge the Tribe's generous monetary support to our community. However, I believe rather than local governments being reliant on the Tribe's donations they should receive revenue in the form of fees, taxes and assessments the same as any other local business. By receiving revenue in this manner local governments can better budget and provide services required by the Tribe's development impacts.
- For future development outside of the existing Rancheria I believe the Tribe should pay the same fees, assessments and taxes as any other business. Additionally, I believe the Tribe should be held to the same development and building standards as any other developer.

I86-01

In conclusion, I would like to reiterate that I am opposed to the Tribe (or any other Tribe) expanding or developing new casino gaming facilities in Shasta County beyond what currently exists. I am opposed to additional lands being transferred from fee to trust status for this project. I am not opposed to additional development consistent with the Shasta County general plan as long as it follows the same process and subject to the same assessments as other developments.

Thank you for the opportunity to express my opinions,

Sincerely,

Doug Wenham
3802 Tea Rose Ct.
Redding, CA 96001

Comment Letter I87

From: **Tammy Cole** <cole.tc.x@gmail.com>
Date: Sun, Jun 16, 2019 at 6:52 PM
Subject: [EXTERNAL] Draft EIS comments, Redding Rancheria Fee to Trust and Casino Project
To: <chad.broussard@bia.gov>

To: Chad Broussard, Bureau of Indian Affairs
From: Tammy Cole
Date: June 16, 2019
Re: Draft EIS comments, Redding Rancheria Fee to Trust and Casino Project

When Win River opened their current location on Hwy 273, they lit up the sky with a giant spotlight that reached out and grabbed our visual attention from locales all over Shasta County. This went on for, I would guess, at least year (though it seemed so much longer!), making it impossible for folks like me to sit out in the evening just to enjoy the night sky, let alone find the Milky Way. The visual distraction was a most unwelcome interference of our peaceful evenings.

The artist's rendition of the proposed complex promises to ruin the rural agricultural landscape while at the same time killing the prime ag soil beneath, making it impossible to ever reclaim.

With this massive (230 acres!) complex in place and visible from all over the County, I-5 and Redding will begin to resemble Las Vegas and Henderson NV, the antithesis of our rural Shasta County lifestyle.

Light pollution will increase exponentially and, along with the unavoidable noise pollution, will degrade the quality of life of residents for many miles around, including their property values.

We also need to consider all the other lives within the riparian habitat along the Sacramento River, which the proposed Win River complex would claim. There is no way to justify the loss by death and displacement of so much wildlife. I87-01

The two new already approved shopping centers going in at the nearest I-5 exit 675, just up the hill, will already cause tremendous traffic congestion for which we have yet to see a workable resolution. (Much as I like traffic circles, I don't see them as able to handle a problem this labyrinthine.) With the addition of thousands more vehicles going to and from the casino complex, I can see nothing but gridlock at all entrances and exits. Those of us who regularly use this intersection daily will likely have to reroute to Cypress Street in Redding or detour through Anderson. Neither of these options is reasonable.

I attended the BIA hearing in Redding on May 20. I listened to every single comment from those for and opposed to relocating and expanding the Win River Casino to I-5 and South Bonnyview location.

I don't think anyone can argue that the Win River organization hasn't contributed mightily to the community that includes Shasta County and the cities, towns, and organizations within its borders.

However, for all of the reasons I have cited above, I do strongly object to the proposed project at the proposed location. Please do not approve the Fee to Trust for this property.

Tammy Cole
6043 Oak Street
Anderson CA 96007
cole.tc.x@gmail.com

From: **Candie Sullivan** <sullydesign@snowcrest.net>
Date: Mon, Jun 17, 2019 at 12:08 PM
Subject: [EXTERNAL] Proposed casino in Churn Creek Bottom
To: <chad.broussard@bia.gov>
Cc: <info@speakupshasta.org>

Sullivan family
19981 Welcome Way
Redding, CA 96002

Subject: Proposed casino in Churn Creek Bottom

As a resident of Shasta County for over 32 years and a homeowner in Churn Creek Bottom for 30 years, I have seen many changes, some good (Knighton road extension), some bad (proposed Flying J truck stop, proposed auto mall, homelessness, drug addiction, increase in crime).

Like many other residents, I was drawn to this area by its' beauty and the small town feel. I have raised my children here and have witnessed all the beauty that is Churn Creek Bottom, small family farms, friendly neighbors and lots of wildlife, including foxes, squirrels, rabbits, quail, pheasant, turkey, deer, coyotes, skunks and opossums, just to name a few.

I oppose the destruction of the beautiful "strawberry fields" to construct a massive casino and resort. Doing so would devastate this important natural habitat and destroy the enjoyment of wildlife in this area by future generations. It would increase traffic and attract crime, just as the existing casino experiences. I88-01

The Wintu tribe should consider it their duty to be good stewards of the land and the wildlife that call it home, just as their ancestors did before them. Their survival depended on the animals and plants. By destroying them, they would endanger their own existence.

Just as realtors are concerned with "curb appeal" when selling a home, I believe this entire community should be concerned with "curb appeal" from visitors visiting our city from the south. Right now they see beautiful farm land occupied by deer and wild turkey grazing on grass growing in the river loam rich soil. I don't see a huge casino with brights lights as "curb appeal" but instead commercial blight best reserved for Las Vegas.

Let's keep Redding beautiful. I oppose the casino in Churn Creek Bottom.

Sincerely,

Candie Sullivan and family

Comment Letter I89

David Ledger
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June 17, 2019

Amy Dutschke, Regional Director
Chad Broussard, Environmental Protection Specialist
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RE: Redding Rancheria Casino Project Fee to Trust Draft EIS

Dear Ms. Dutschke and Mr. Broussard,

To follow are my comments on the environmental impacts of the proposed Redding Rancheria Casino Project Fee to Trust Draft EIS. While I support the principal of California tribes regaining land that was stolen from them during the gold rush period by white settlers and the State of California, and regaining title as tribal lands and for them to be granted fee to trust lands at the "Strawberry Field," there are certain aspects of the proposed casino that I feel do not meet the requirements of the National Environmental Protection Act. I89-01

Below are comments on the proposed Casino site on "Strawberry Fields," Alternative A.

1. AESTHETICS: The proposed casino on agricultural land along I-5 with a nine story, 89 feet tall hotel will have a significant negative effect on the aesthetics of the area. This will not only the be tallest building in Redding, but the tallest building on the I-5 Freeway north of Sacramento. This tall of a building on what is currently zoned as agricultural land cannot be mitigated even with the planting of trees. This will also have a very negative effect on the aesthetics of the view from the freeway and from the Sacramento River for those enjoying the river for recreational reasons whether boating, rafting or fishing. Combined with the large casino and proposed shopping center, this will forever degrade the aesthetics of this area. Unless the hotel was reduced to three stories in size and the project reduced in size to that of Alternative B, the current proposal should be denied.

2. HYDROLOGY AND BIOLOGICAL: The use of riprap to prevent soil erosion during high level Sacramento River flows will be detrimental to the riverine system and is ultimately a channelizing of the River even if the boulders are covered with smaller rocks and soils similar to those existing onsite. This will ultimately result in erosion on the western bank of the River and downstream of the riprap. When channelizing of the river with riprap occurs in one place on a river it ultimately results in transferring the erosion to the opposite side of the river or immediately downstream. This needs to be addressed in mitigation issues. I89-02

The description of the Sacramento River Streambank Stabilization in the Biological Assessment/Essential Fish Habitat Section 4.1 it describes the riprap project as having a "potentially beneficial impact on the surface water quality of the Sacramento River in the vicinity of the Action Area by reducing the amount of fine sediment discharged into the river." As noted above, riprap has been shown to be detrimental to river ecosystems as it often causes erosion on opposite sides of the river, thereby requiring further erosion and a further channelization of the Sacramento River as more riprap is place to stop increase erosion on the opposite side of the river. Increased sediment during flood events is a natural occurrence and is part of the natural changing of the river environment, depositing the sediments in an area downstream from where they are removed.

I89-02 (Cont.)

The use of this riprap system has not addressed how it might adversely affect the habitat of the Bank Swallow *(Riparia riparia)*.

I89-03

3. BIOLOGICAL: Invertebrate Survey: An updated plant and invertebrate survey for the blue elderberry shrub and the Valley Elderberry Longhorn Beetle (VELB), a federally listed species, needs to be undertaken.

A survey done by Paul Kirk of North State Resources in 2007 found 62 elderberry shrubs in the study area and 13 of the shrubs had characteristic exit holes of the VELB. A follow-up survey conducted by Analytical Environmental Services in 2017 could only locate one of the 62 aforementioned blue elderberry shrubs on the project site. The map of the project only lists one plant on the project site. This indicates only a casual effort was made to locate elderberry shrubs. It is very unlikely that all of the 62 elderberry shrubs would have been cut down and not resprouted or died from the drought. There are many elderberry shrubs within one mile of the projects site that survived the drought. Specifically elderberry shrubs have recently been found: at the site of the now developed Churn Creek Market Place project on Churn Creek Road at South Bonnyview Road; in the CalTrans right of way on I-5 southbound near the Bonnyview Road exit; near the Bonnyview boat ramp across from the project site; and along Olney Creek and Sacramento Drive just west of the Project to name a few.

I89-04

There is not a plant survey presented by Analytical Environmental Services in any attachments, nor the method of any survey, just a note that additional surveys were conducted, a botanical survey on May 16, 2016 and March 13, 2017 which could be outside the blooming time of several listed plant species. The qualification of the person conducting those surveys should be listed as they could only find one elderberry shrub out of 62 found in 2007.

The Valley Elderberry Longhorn Beetle has been found in a USFWS study conducted in 1992 at Turtle Bay East near Highway 44 in Redding which is north of the project. Exit holes of the VELB were found during a biological survey done on Sacramento Drive, Redding in 2005 within one mile of the Project.

New protocols for the VELB range were adopted in May 2017 and they include all areas of the Sacramento Valley below 525 feet in elevation which includes the project site.

Because of the vast difference in the number of blue elderberry shrubs found in the 2007 survey and the 2016 and 2017 survey, the lack of any plant list for the most recent survey, the methods taken and the individual who took the survey, the draft EIS is inadequate and a new plant

survey needs to be taken for blue elderberry shrubs and signs of the VELB and all state and federal listed plants and with the potential to exist in the project area and in the undeveloped areas downstream.

I89-04
(Cont.)

In conclusion, the above environmental concerns were not adequately addressed in the DEIS and need to be done in the final EIS.

Respectfully submitted,

David Ledger

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June 17, 2019

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By E-mail and Post

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Re: DEIS Comments, Redding Rancheria Project

Dear Director Dutschke:

Thank you for the opportunity to comment on the Bureau of Indian Affairs' ("BIA") Draft Environmental Impact Statement ("DEIS") for the Redding Rancheria Fee-to-Trust and Casino Project ("Proposed Project" or "Alternative A") at the Strawberry Field Site in Shasta County, California. I write on behalf of over 56 concerned neighbors, business owners, and community members ("Concerned Neighbors") who will be directly affected by the Proposed Project's significant environmental impacts on their homes, businesses and community.[1]

The Redding Rancheria's ("Tribe") Proposed Project would transfer approximately 232 acres of agricultural lands and lands within the 100-year floodplain of the Sacramento River from fee to federal trust status to facilitate the construction of a 69,541 square foot casino, a nine-story, 250-room hotel, conference center and 1,800 seat event center, a 1,500 seat outdoor amphitheater, restaurants, a 130,000 square foot retail store for outdoor sporting goods, and parking for over 2,500 vehicles. As people who live and work in the area adjacent to the Strawberry Fields Site, the Concerned Neighbors are concerned about the significant change in land use contemplated by the DEIS and the serious environmental and quality of life impacts that they and the surrounding community will face if the BIA approves the Tribe's application. These concerns include site access and traffic-related impacts, water resources impacts, and noise impacts, among others. I90-01

The National Environmental Policy Act ("NEPA") requires the BIA to take a "hard look" at the environmental issues related to the Proposed Project and, at the same time, adequately inform the public of the BIA's decision-making process. The Indian Reorganization Act ("IRA") and the

[1] Each Concerned Neighbor is identified in Attachment A of these comments.

BIA's own implementing regulations require BIA to consider community impacts from fee-to-trust applications and to analyze community impacts through the NEPA process in order to take land into trust. Here, however, the DEIS contains many flaws, inaccuracies, and ambiguities regarding the Proposed Project's environmental and land use impacts, its alternatives, and impacts on the surrounding community. By ignoring the well-founded concerns of state and local stakeholders during scoping and prior comment processes, BIA has offered an inadequate document that fails to satisfy NEPA's basic requirements.

It is inappropriate for BIA to stack the deck in favor of the Proposed Project and exalt economic development over the significant environmental issues that require close consideration under NEPA and its implementing regulations. The fact is that the Tribe currently has significant opportunities for economic growth. Located less than two miles from the Strawberry Field Site, the Tribe's Win-River Casino operates on 14.8 acres of federal trust land, including an 84-room hotel, an event center, restaurants, and parking. Expanding the existing Win-River Casino Site (Alternative F) appears feasible, would satisfy the Tribe's desire for further economic development, and would do so with limited environmental impacts and disruption to the surrounding community. Alternative F is unquestionably the environmentally preferred alternative, and the BIA should consider it as the potential preferred alternative in a revised DEIS and in the final EIS.

I90-01 (Cont.)

In addition to commenting on the DEIS's fatal shortcomings, the Concerned Neighbors raise concerns regarding the BIA's application of the Indian Gaming Regulatory Act ("IGRA") to the Proposed Project. Specifically, Strawberry Fields does not qualify as "restored lands" under IGRA, and the Tribe cannot bypass IGRA's two-part determination requirement in pursuit of economic expediency.

The following comments provide additional details regarding the Concerned Neighbors' concerns.

I. The DEIS's Purpose and Need Statement is Inadequate

The Proposed Project's purpose and need is stated on page 1-2 of the DEIS: "The purpose of the Proposed Action is to facilitate tribal self-sufficiency, self-determination, and economic development." The DEIS's purpose and need statement contains several flaws: (1) it presumes that the Proposed Project satisfies BIA's land acquisition policy; (2) it fails to identify BIA's relevant legal duties/evaluation criteria when acting on the Proposed Project; and (3) it contains insufficient detail needed to ascertain whether the DEIS satisfies key elements of NEPA including the development and screening of alternatives.

I90-02

First, the DEIS presentation of the Proposed Project's purpose and need is inadequate because it unlawfully presumes the Tribe's economic development interests satisfies the BIA's land acquisition policy without considering whether, and to what extent, the Tribe's desire for economic development complies with the Indian Reorganization Act ("IRA"), 25 U.S.C. § 5108, and BIA's regulations at 50 CFR § 151.3. While the Agency has discretion when defining the purpose and need of a project, an unreasonably narrow or pre-determined purpose and need statement

violates NEPA. *City of Carmel-by-the-Sea v. U.S. Dep't of Transp.*, 123 F.3d 1142, 1155 (9th Cir. 1997).

The BIA may acquire land in trust for tribes when, among other things, the "Secretary determines that the acquisition of the land is *necessary* to facilitate tribal self-determination, economic development, or Indian housing." 50 CFR § 151.3(a)(3) (emphasis added). A tribe's desire for land to build a casino, related amenities, and a retail outlet does not automatically render a land acquisition "necessary"; particularly where, as here, the Tribe already enjoys 14.8 acres held in federal trust on which it operates the 141,607 square foot Win-River Casino and related entertainment and retail amenities.[2] And yet, by ignoring the Tribe's existing economic potential, the DEIS's purpose and need statement presupposes such necessity at Strawberry Fields. At the very least, the purpose and need statement should be revised so as not to pre-determine that the Proposed Project satisfies the IRA and the BIA's requirement per 151.3(a)(3) to make a determination that the Proposed Project is "necessary." I90-02 (Cont.)

Second, the purpose and need statement describes the need for the BIA to act on the Tribe's fee-to-trust application as established by BIA's land acquisition regulations at 25 CFR § 151(h) and 151.12. While this may be true, the purpose and need statement does not adequately inform the public of BIA's legal duties when undertaking the proposed action. Noticeably absent from the purpose and need statement are BIA's land acquisition evaluation criteria at 25 CFR § 151.10(a)-(g). The purpose and need statement must be revised to specifically refer to, among other things, 151.10(a) (the existence of statutory authority for the acquisition and any limitations contained in such authority[3]); § 151.10(b) (the need of the tribe for additional land); § 151(e) (impact on the State and its political subdivisions resulting from the removal of the land from the tax rolls); and, importantly, § 151.10(f) (jurisdictional problems and potential conflicts of land use which may arise). Finally, the DEIS fails to adequately explain and specify the Tribe's plans and the anticipated economic benefits associated with the Proposed Project as required by 151.11(c). Consistent with other sections of NEPA analysis, BIA completely ignores the laws balancing the complex interaction of federal, state, local, and tribal sovereignty. I90-03

Third, the statement of purpose and need is very general and more detail needs to be provided regarding how the purpose and need for the project can be achieved for the following key NEPA elements: I90-04

- Developing a range of alternatives;

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[2] In fact, the legislative history of the IRA shows that the purpose of the Act was to respond to the immediate need for land for homeless Indians in order to create subsistence opportunities such as agricultural endeavors. *See* House Report No. 1804, 73rd Cong. 2d. sess. (May 28, 1934) at 6-7.

[3] For more on this particular evaluation criteria, see Section VIII below and our comments and concerns regarding the application of IGRA to the Proposed Action.

- Screening alternatives against the purpose and need for the proposed action; and
- Rejecting alternatives for not achieving the purpose and need for the proposed action.

The Tribe's objectives are focused on the Strawberry Fields Site as a part of the Tribe's traditional territory. The DEIS alternatives include several rather similar alternatives for using the Strawberry Fields Site; less attention is paid to other tribal and non-tribal land. The DEIS and scoping report, however, lack a clear description of the connection between the purpose and need for the proposed action by BIA and the Tribe's objectives and the development of the range of alternatives, as well as the rejection of alternatives. The DEIS's analysis fails to take a sufficiently "hard look" at how the purpose and need of this project can be satisfied and, as a result, fails to adequately inform the public of the Proposed Project's many environmental and land use impacts, or considers the consequences of the different alternatives. I90-04 (Cont.)

In sum, the current purpose and need statement suggests that BIA has merely ratified a preordained decision, and the DEIS lacks sufficient detail to determine whether the DEIS satisfies key elements of NEPA. The DEIS must therefore be revised consistent with the remarks above.

II. The DEIS's Alternatives Description and Analysis is Deficient

The DEIS alternatives discussion includes many shortcomings including (1) failing to provide sufficient information for each alternative; (2) failing to explain how alternatives were screened and selected; and (3) performing an inadequate and misleading alternatives comparison.

First, the description of each alternative is insufficient. A supplemented and recirculated EIS should correct the following deficiencies:

- The DEIS fails to describe Project elements in detail, and not all elements are labeled on the figures, which consist only of a site plan and architectural rendering for each of the alternatives (Sections 2.3 – 2.8 and Figures 2-8 – 2-17).
- The architectural renderings do not clearly identify or describe the Project elements (Figures 2-9, 2-11, 2-13, 2-15, and 2-17) as there are no labels on the renderings in addition to the lack of complete labels on the site plans. I90-05
- The alternatives description lacks specific elements necessary for a proper NEPA analysis, including:
    - It is not clear where the amphitheater is located on the site. This leads to a deficiency in the noise analysis due to lack of description of the project elements. While the noise chapter discusses the location of the amphitheater on pages 4.11-9 and 4.11-10 in a way that makes it seem that the BIA had inside information about the amphitheater layout and location, the lack of this information in the EIS makes it impossible for the public to either understand the analysis or comment on

its adequacy. Other environmental effects could be affected by the layout and location of the outdoor amphitheater, including light and glare impacts when the amphitheater's exact location is revealed to the public.

- Five tall elements are shown on the architectural renderings for Alternatives A, B, and C (Figures 2-9, 2-11 and 2-13) that are not described in the text. Are these screens for the amphitheater? Lighted signs? The DEIS failed to describe noise and light and glare from these elements, as well the visual impacts from these elements.

I90-05 (Cont.)

- Two towers are shown on either side of the parking lot on the south end of the casino complex on the architectural renderings for Alternatives A, B, and C (Figures 2-9, 2-11 and 2-13). They appear to be five stories high. No labels or descriptions of these towers or the uses to be located in them is provided. It is impossible to assess whether the effects analysis includes these project elements.

- The two-paragraph description of "Architecture, Signage, Lighting and Landscaping" on page 2-16 for Alternative A, which is referenced on page 2-25 for Alternative B, and not described for other alternatives, lacks sufficient information for determining the effects associated with these project elements, including:

    - Architectural style (text on page 2-16 says "will enhance the natural and rural characteristics of the site"). This conclusion is incompatible with the architectural renderings for Alternatives A, B, C, D and E (Figures 2-9, 2-11, 2-13, 2-16 and 2-17), which show tall and prominent urban-style structures, including, a 9-story hotel and a multi-level parking garage, on greenfield development against the Sacramento River.

    - The DEIS fails to describe how many signs are proposed; where the signs will be located; and how large the signs will be. In addition to being illuminated, as stated in the DEIS on page 2-16, will the signs allow projection of video?

    - How will the landscaping screening conceptually indicated on the architectural renderings be achieved? What is the timeframe for maturation of the landscaping?

I90-06

- Grading and drainage plan. Although, as stated in the DEIS on page 3.3-6, the development footprint is not within the 100-year flood plain, the remainder of the site is within the 100-year floodplain and the site does include areas subject to flooding from Churn Creek (page 2-19) and inundation from Sacramento River (page 2-20). The DEIS fails to include the grading and drainage plan, and it is unclear whether the grading and drainage study in Appendix C is a part of or corresponds to the Proposed Project.

I90-07

- The "wet pond" description on page 2-20 is confusing and fails to match the description in Appendix C. To locate the wet pond, it is necessary to look in Appendix C Figure A4. The location of the wet pond should be in the EIS description of the alternatives. I90-08

- Appendix C contains a number of actions that would address water quality. It is not clear these are a part of the Proposed Project, alternatives, or satisfy NEPA's mitigation requirements. I90-09

- Sacramento River Streambank Stabilization is described briefly as a part of the Proposed Project on page 2-20. No figure shows where this would be located. Also, although there is a schematic in Appendix C, there is no description of the construction activities involved. Would there be in-water work? If not, how would the work be performed? I90-10

- On page 2-20, gas service to the Proposed Project is to be provided as new service from PG&E, but new facilities are not described in the description of the Proposed Project and alternatives. I90-11

Second, neither the DEIS nor the scoping report provides sufficient documentation and explanation for how BIA screened and selected the range of alternatives. *Westlands Water Dist. v. U.S. Dept. of Interior*, 376 F.3d 853, 868 (9th Cir. 2004) (stating that an EIS must contain a reasonable range of alternatives such that the "selection and discussion of alternatives fosters informed decision-making and informed public participation"). The DEIS also fails to explain the alternatives screening process, including screening criteria and a specific assessment of each alternative regarding whether it met the criteria.

Particularly troubling, the DEIS dismisses as uneconomic the public-proposed Vineyard alternative in only a few sentences (page 2-50), which seems to be the primary reason it was disfavored by the Tribe, but did so without any economic analysis. The Vineyard alternative, or similar agricultural-based alternative, would fulfill the primary project objectives as described in the DEIS: to restore the land base of the Tribe, ensure that the Strawberry Fields Site is adequately maintained and protected for future generations, and that the Tribe has the ability to exercise its jurisdiction as a sovereign tribal government over the Site. DEIS at 1-2. The Vineyard alternative, or similar, is also consistent with existing land uses for the Strawberry Field Site, which is one of the BIA's key evaluation criteria for the fee-to-trust application. 25 CFR § 151.10(f) (requiring the BIA to consider potential land use conflicts that may arise as part of the land acquisition). Further, the DEIS fails to consider or address whether there is another alternative for the Strawberry Fields Site that could be economically viable, consistent with the primary project objectives, and more consistent with existing land uses. And, finally, the DEIS presents no information from which the public can ascertain whether any alternative similarly sized to the Proposed Project was considered. I90-12

Third, the DEIS's flaws with respect to the purpose and need statement infect the DEIS's alternatives comparison. NEPA requires an EIS to compare the impacts of the proposed action and its alternatives, "thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public." 40 CFR § 1502.14. Project alternatives are derived from an EIS's purpose and need statement and "the agency may not define the objectives of its action in terms so unreasonably narrow that only one alternative from among the environmentally benign ones in the agency's power would accomplish the goals of the agency's action, [or] the EIS would become a foreordained formality." *Citizens Against Burlington, Inc. v. Busey*, 938 F.2d 190, 196 (D.C. Cir. 1991).

Because of the inadequacies of the DEIS's purpose and need statement, the information presented in the DEIS's alternatives comparisons, *see* DEIS at 2-53, is misleading and unfairly favors the Proposed Project due to the potential for greater economic returns to the Tribe. The comparison of alternatives section glosses over the environmental impacts associated with the Proposed Project and its alternatives and fails to quantify the degree of impacts associated with each alternative. Critically, the DEIS concludes that Alternative A best meets the purpose and need without considering environmental and land use impacts. This is despite BIA's own regulations requiring that it consider potential land use conflicts that may arise as part of the land acquisition. 25 CR 151.10(f). And, while the comparison of alternatives emphasizes the economic consequences of the Proposed Project and its alternatives from a revenue generating perspective, it fails to consider "the impact on the State and its political subdivisions resulting from the removal of the land from the tax rolls." 25 CFR 151.10(e).[4]

I90-13

The alternatives section in the DEIS must be revised to provide the public with complete information regarding the degree of environmental impact, the selection and screening process for the range of alternatives, and an adequate presentation of alternatives from which the public can make an informed comparison of the alternatives.

[4] The DEIS does not reference or discuss the California Department of Tax and Fee Administration (CDTFA) Publication 146 (available at https://www.cdtfa.ca.gov/formspubs/pub146.pdf), which addresses whether the state can apply sales and use taxes to revenues generated on trust lands. The DEIS must be revised to include a discussion of CDTFA Publication 146 and provide a robust assessment of the impacts associated with removing the Strawberry Fields Site from state and local tax rolls.

III. The DEIS's Description of Access Options for the Proposed Project and the Analysis of the Related Traffic Impacts Are Inadequate

The traffic impacts analysis contains numerous flaws and errors that must be addressed before BIA can conclude there are no significant traffic impacts associated with the Proposed Project. A more detailed analysis is included in the attached technical comments on the DEIS's traffic impact analysis identified as Attachment B.

a. Access Issues

The DEIS glosses over the troublesome issue of accessing the Strawberry Fields Site. The North Access Only option, where access to the Proposed Project is provided on Bonnyview Road via Bechelli Lane, lacks sufficient capacity for the volume of vehicles exiting the Strawberry Fields Site. The intersection of Bonnyview and Bechelli, a narrow two-lane road, is barely 700 feet from one of the busiest interchanges in the City of Redding, the interchange to Interstate 5 (I-5), which is prone to queue overflows. Further, the Proposed Project conflicts with the City's plans for constructing a diverging diamond interchange with roundabouts at the intersection of Bonnyview Road with Bechelli Lane and Churn Creek Road, and would likely exhaust the entire capacity of the planned one-lane on ramp to the I-5. Given the Project's size, at least two access points are required. Southerly access to the Proposed Project via Smith Road is infeasible, however, because it is inconsistent with the City's Traffic Impact Study (TIS) Guidelines for residential streets. The DEIS's traffic impact analysis, Appendix F, fails to adequately address these significant access issues and must be revised. I90-14

Emergency access presents a particularly acute public safety hazard at Strawberry Fields. With only one access point, the DEIS does not explain how people will leave at the same time as heavy fire trucks and service vehicles arrive, particularly during peak travel times and periods of I-5 on ramp congestion.

b. Peak Hour Counts

The methodology and baseline assumptions for the traffic impact analysis contain a number of flaws. The analysis fails to identify traffic impacts during the peak hour of adjacent street traffic when impacts are most substantial. Each of the relevant traffic study guidelines (Caltrans, Redding, Shasta County) require analysis of peak hour conditions. Further, the DEIS' traffic study conducted traffic counts when schools were not in session, resulting in substantially lower baseline counts. The DEIS based its trip distribution analysis on Wi-Fi surveys, which are known to be unreliable indicators of actual traffic counts. I90-15

c. Intersection and Street Analysis

The DEIS also fails to address the level-of-service impacts to surrounding intersections. Specifically, the study area evaluates only ten area intersections, and ignores CalTrans guidelines to evaluate all intersections that may experience 50 or more peak hour trips. Impacts at all I90-16

intersections where the project could have potential impacts should be analyzed and those impacts disclosed.

The impacts analysis is also flawed because it fails to identify direct Project impacts, even though several locations go from acceptable operations to unacceptable operations as soon as Project trips are added. There are many locations where Project-related increases result in much higher increases in delays than those specified in the City of Redding's Traffic Study Guidelines. The DEIS improperly assumes such impacts can be mitigated with a "fair share" obligation, overlooking the requirement that direct Project impacts be subject to direct Project mitigation. Further, the traffic impacts analysis fails to include any queuing analysis or turn lane storage evaluations for intersections, despite guidelines from the City of Redding to do so. The DEIS needs to be amended to address these flaws and provide a realistic analysis of the Project's direct contribution to traffic on City streets and intersections.

I90-16 (Cont.)

d. Trip Generation Analysis

The DEIS's trip generation analysis contains critical errors that significantly underestimates the massive influx of vehicles expected to descend on the Proposed Project during special events and normal casino/hotel operations. The DEIS improperly takes credits for "complementary" land uses, assuming without reason or sufficient explanation that 75% of the hotel guests are likely to be casino guests, and 70% of event center attendees would already be on-site, using the casino. The DEIS assumes an Average Vehicle Occupancy (AVO) of 2.2 for the event center and conference center, whereas practical experience shows that conferences are attended by people who arrive in single-occupancy vehicles. The DEIS traffic analysis also completely excludes Project staff and employees from expected trip generation; a significant oversight that could add approximately 10% to the traffic numbers. Taken together, the result is an unrealistic analysis that severely underestimates project trip generation.

I90-17

IV. DEIS's Description of the Water Resources and Proposed Project Impacts is Inadequate

The DEIS contains significant flaws and missing information regarding the impacts to water resources associated with the Proposed Project, including impacts to the Sacramento River and its floodway from stormwater, wastewater, and bank stabilization activities.

First, the DEIS is unclear on whether the Proposed Project (or other alternatives at the Strawberry Fields Site) is located within the floodway of the Sacramento River. The DEIS needs to be revised to provide the public with more information and clarity on this key aspect of the Proposed Project and whether and to what extent there will be water quality impacts associated with aspects of the Proposed Project that are within or bordering the floodway.

I90-18

For instance, the Proposed Project stormwater retention pond appears to be within the 100-year flood zone of the Sacramento River. DEIS, 2-20; DEIS Appendix C, Figure A 4. The DEIS should be revised to describe whether placement of retention ponds within the 100-year floodplain is

allowed under applicable regulations or is appropriate, based on engineering standards, and whether such retention ponds can be included in any water retention-based calculations for the Proposed Project. If not, it may be that the storm drainage plan does not adequately provide capacity to handle on-site drainage. The DEIS also acknowledges on pages 2-19 – 2-20 that during extreme runoff events, the retention pond will spill into the Sacramento River. During flood events the pond will be submerged and thus directly discharge into the Sacramento River.

The DEIS's water effects evaluation fails to provide sufficient information to understand how the Proposed Project would address water quality impacts to the Sacramento River from the retention pond during extreme rain and flood events. Similarly, there is no evaluation of the potential for the leach fields to be inundated in the event of a storm larger than the 100-year flood, which occurs more frequently with changes in climate.[5] The leach field as shown on Figures A1 and A3 of Appendix C is designed to follow the boundaries of the FEMA FIRM 100-year flood plain, with no buffer. The DEIS needs to be revised to address whether the Proposed Project anticipates having a Clean Water Act NPDES permit or other water quality protections for such discharges from the retention pond and leach field to the River.

I90-18 (Cont.)

Second, there are numerous issues with DEIS's descriptions of the Sacramento River Bank Stabilization activities associated with the Proposed Project. The DEIS's descriptions of the affected environment, DEIS Section 3, appear to leave out the area of Sacramento River Bank Stabilization. Therefore, the affected environment description fails to describe all of the area potentially affected by the Proposed Project and alternatives. Impacts related to this portion of the Project area are not assessed, exposing the DEIS as insufficient under NEPA.

Additionally, the DEIS does not contain a sufficient effects analysis of the construction of the Sacramento River Bank Stabilization element of the project. The Water Resources analysis in DEIS Section 4 states that the mitigation measure provided in DEIS Section 5.5.3 U will reduce impacts to a less than significant level. However, Mitigation Measure 5.5.3 U only requires consultation with federal agencies and obligates the applicant to obtain permits for discharging fill material into wetlands. The effects analysis provides no evaluation of construction effects related to the Bank Stabilization (e.g., sedimentation, vibration effects on fish, etc.) and the mitigation measure only addresses fill of wetland and waters of the United States, not effects on biological resources. While the Project's Sacramento River Bank Stabilization element is treated as an environmental commitment or mitigation measure, the DEIS fails to evaluate the effects of its construction as required by NEPA.

I90-19

[5] *See e.g.*, California Department of Water Resources & U.S. Army Corps of Engineers, California's Flood Future, Recommendations for Managing the State's Flood Risk (November 2013), Attachment C: History of Flood Management in California at C-95 (noting that between December 1996 to January 1997 the Sacramento River experienced its fifth record flood in 46 years).

V. The DEIS's Analysis of the Proposed Project's Noise Impacts is Inadequate

The DEIS's noise effects analysis has serious flaws, including insufficient and misleading analysis of noise impacts from the amphitheater and Proposed Project construction activities.

First, the analysis of noise impacts from the proposed outdoor amphitheater is deficient. Noise effects of the proposed outdoor amphitheater are discussed generally, but because the outdoor amphitheater's specific layout and location are unknown, the noise analysis cannot properly account for how the proposed amphitheater will interact with other environmental effects. Further, the analysis is very superficial and does not include technical analysis, such as modeling using SoundPLAN or another similar model to evaluate the specific noise levels at sensitive receptors. I90-20

The DEIS states that the mitigation measure provided in Section 5.11 A will reduce impacts to a less than significant level. But Section 5.11 A provides only a simple methodology to relate noise levels at the stage and noise levels at the northern boundary of the project site that fails to account for topography, the height of the stage, and the topography between the northern boundary of the project site and the sensitive receptors. In addition, this mitigation measure overlooks crowd noise, which could be substantial and must be evaluated in the DEIS. The measure also ignores sensitive receptors to the south and west of the site, which could experience impacts from crowd noise in addition to other noise depending on the topography and the layout of the amphitheater.

Second, the DEIS inexplicably uses a standard designed for traffic noise to evaluate non-traffic noise. The DEIS cites to Federal Construction Noise standards "based on peak traffic hour noise levels" to analyze amphitheater impacts. DEIS at 3.11-4. For example, unlike the 67 dBA Leq traffic standard applied by the DEIS, the City of Redding Nontransportation noise compatibility standards are 55 Hourly Leq, dB for daytime and 45 Hourly Leq, dB for nighttime,[6] and the Shasta County Nontransportation standards are 55 Hourly Leq, dB for daytime and 50 Hourly Leq, dB for nighttime.[7] I90-21

Finally, the DEIS concludes that construction noise and vibration impacts will be substantial and significant, with noise levels exceeding 80 dB, a very high noise level, generally not considered acceptable for any land use and comparable to the highest noise levels in big city downtowns, even with vibration impacts exceeding the threshold used in the DEIS, especially to the sensitive receptor identified as a residence to the south of the Strawberry Fields site (pages 4.11-2 – 4.11-5). The DEIS states that the BMPs presented in Section 2.3.2 would reduce these impacts to a less than significant level. These BMPs lack performance standards however, that would ensure the reduction of noise and vibration to below thresholds. Additionally, the BMPs include I90-22

[6] City General Plan Noise Element Table 5-5 Noise Level Performance Standards for New Projects Affected By or Including Nontransportation Noise Sources.

[7] County General Plan Noise Element Table N-IV Noise Level Performance Standards for New Projects Affected by Or Including Non-Transportation Sources.

conditional language such as "whenever possible" or "as feasible" that would allow impacts to persist. For these reasons, the BMPs cannot be relied upon to make the finding that the impacts would be less than significant. Definitive mitigation measures must be added to the Proposed Project to reduce the noise and vibration impacts to a less than significant level.

I90-22 (Cont.)

VI. Socioeconomic Impacts

The DEIS's reasoning and conclusions in Section 4.7 - Socioeconomic Conditions contain a number of flaws. Three of the most significant issues include: (1) flawed and incomplete analysis regarding the substitution effects on neighboring tribal casinos; (2) lack of any analysis regarding impacts on and mitigation for drug and alcohol addiction; and (3) inadequate analysis of impacts on crime.

First, the DEIS's conclusion that "[t]he substitution effects resulting from Alternative A to competing gaming facility revenues are not expected to significantly impact these facilities, or to cause their closure" is highly questionable. DEIS at 4.7-4. The data in Table 4.7-3 directly contradicts the BIA's conclusion that Alternative A would not significantly affect competing tribal casinos. Indeed, according to Table 4.7-3, Rolling Hills Casino (Paskenta Band of Nomlaki Indians) would suffer a 5.8% loss of revenues in year one and the Pit River Casino (Pit River Tribe) would suffer a 7.2% loss of revenues in year one. These are significant losses and could seriously impact the casinos profit margins and viability. Thus, as presented, the data reflects a significant impact on neighboring tribal casinos and the DEIS either must amend its conclusion or provide more concrete economic analysis to support it.

I90-23

The DEIS further concludes that the "[s]ubstitution effects are anticipated to diminish after the first year of Alternative A operation because local residents would have experienced the casino and would gradually return to more typical and more diverse spending patterns." DEIS at 4.7-4. This conclusion is vague and unsupported. The DEIS provides no data showing that after one year residents would return to "diverse spending patterns" and that those "diverse spending patterns" would have on neighboring tribal casinos. The DEIS needs to provide actual evidence to support this conclusion.

I90-24

Second, the DEIS analyzes the Project's potential impacts on problem and pathological gambling, but does not analyze, or even mention, the Project's potential impacts on alcohol and drug addiction. It is accepted science that problem gambling and alcohol abuse have a high co-occurrence. *See e.g.* Welte J, Barnes G, Wieczorek W, Tidwell MC, Parker J, *Alcohol and Gambling Pathology Among U.S. Adults: Prevalence, Demographic Patterns and Comorbidity*, J STUD ALCOHOL. 62(5):706-12 (2001); Grant JE, Kushner MG, Kim SW., *Pathological Gambling and Alcohol Use Disorder*, ALCOHOL RESEARCH AND HEALTH. 26:143–150 (2002); Barnes GM, Welte JW, Hoffman JH, Tidwell MC, *Gambling, Alcohol, and Other Substance Use Among Youth in the United States*, J STUD ALCOHOL DRUGS 70(1):134-42 (2009). A 2006 National Opinion Research Center report, "California Problem Gaming Prevalence Survey" shows a clear correlation between at-risk and problem gamblers and an increase in mental health issues and alcohol and drug abuse. Thus, the DEIS's analysis of socio-economic impacts is incomplete

I90-25

without analyzing impacts on, and proposed mitigation measures for, alcohol and drug addiction in surrounding communities, which is bound to increase with the introduction of the Proposed Project.

I90-25 (Cont.)

Third, the DEIS analysis of impacts on crime is inadequate. The DEIS contends that "[t]here is a general belief that the introduction of legalized gambling into a community increases crime [but that] this argument is often based on anecdotal evidence rather than empirical evidence." DEIS at 4.7-11. The DEIS cherry-picks a few studies that show that ski tourism resulted in a larger increase in crime than casino development and that casinos increase crime for the first few years of operation, and then crime rates go down. *Id.* These two studies, however, do not present a complete picture of the literature connecting crime and casinos. For example, a report requested by the California Attorney General found a link between casinos and serious crimes. Charlene Wear Simmons, *Gambling in the Golden State: 1998 Forward*, available at https://oag.ca.gov/sites/all/files/agweb/pdfs/gambling/GS98.pdf. The 2006 National Opinion Research Center report discussed above also indicated that problematic gamblers are more likely to have been arrested and/or incarcerated.

I90-26

The DEIS analysis also contains misleading information regarding crime reports, which contradicts information from the Shasta County Sherriff's Office. The DEIS states the current Win-River Casino only calls the Sheriff's Office 2-5 times per month. Appendix A at 25. However, according the Sheriff's Office comment letter, the Office was called for 1351 incidents stemming from Part 1 crimes between January 2017 and October 2018. Capt. Pat Kropholler, Shasta County Sheriff's Office Review, Redding Rancheria DEIS, May 22, 2019. Even using the DEIS's high estimate of 5 calls per month for each of these months, and putting aside non-Part 1 crimes, there is a discrepancy of 1,241 calls to the Sheriff's Office. The DEIS must conduct a more thorough analysis of the literature surrounding crime increases following casino openings and account for this discrepancy in the number of calls to the Sheriff's Office.

I90-27

VII. BIA Failed to Include Meaningful Input from Cooperating Agencies and Prepare a Document that Satisfies State and Tribal Law

BIA failed to include critical input from the cooperating agencies City, County, and CalTrans during the drafting of the EIS. Failing to account for state and local concerns has resulted in a DEIS that piecemeals a full environmental review under NEPA and insufficiently evaluates the casino's true environmental impacts.

a. The BIA Failed to Incorporate a CEQA Analysis and Appropriate Mitigation Measures Developed by Cooperating Agencies

I90-28

While the City, County, and CalTrans are named "Cooperating Agencies," the DEIS fails to fully evaluate the Project's impacts and potential mitigation measures under state and local environmental law. Under NEPA, Cooperating Agencies can be federal, state, or tribal entities that have jurisdiction by law or special expertise with respect to any environmental impacts. 40 CFR § 1501.6; 43 CFR § 46.225. If in the course of environmental review a lead agency omits

a significant issue or ignores the advice and expertise of a cooperating state or local agency, the EIS may be inadequate. Indian Affairs NEPA Guidebook at 14b.

NEPA requires that cooperating agencies be identified early in the scoping process and assume responsibility for proposing mitigation measures necessary to allow a state or local permit, license or related approval to be granted. 40 CFR § 1503.3(d). All mitigation measures that could improve the project must be identified, even if they are outside the jurisdiction of the lead agency or the cooperating agencies. 40 CFR § 1502.16(h); 1505.2(c); Indian Affairs NEPA Guidebook at 19b. The EIS should indicate the likelihood that such measures will be adopted or enforced by the state and local agencies responsible for developing and enforcing them. *Id.*

NEPA also requires lead federal agencies to cooperate with state and local agencies in environmental decision-making to reduce duplication between NEPA and state and local environmental requirements, like CEQA. See 40 CFR § 1506.2; *Nw. Sea Farms v. United States Army Corps of Eng'rs*, 931 F. Supp. 1515, 1523 (W.D. Wash. 1996). Lead agencies are encouraged to cooperate with state and local agencies in the preparation of joint environmental statements and on matters of local jurisdiction and expertise. 40 CFR § 1506.2(c); 43 CFR § 46.230. In California, the CEQA guidelines similarly urge state agencies to "consult as soon as possible with the Federal agency" in circumstances where state authorization is necessary in connection with a federal project. Cal. Code Regs. Tit. 14, § 15223. The Tribal-State Compact Between the State of California and the Redding Rancheria requires the Tribe to make a good faith effort to incorporate a CEQA review into the environmental analysis and mitigation of off-site environmental impacts associated with new gaming facilities. *See* Tribal-State Compact at 10.8.1; 10.8.2. The cooperation required of federal, state, local and tribal entitles show that Federal environmental decision-making is not made in a vacuum.

I90-28 (Cont.)

Here, the DEIS fails to give adequate attention to CEQA or analyze the environmental considerations of state and local cooperating agencies with special expertise over aspects of the Project. At several points, the DEIS simply states, "Any infrastructure improvements required by the development of Alternative A, [the Proposed Action,] would abide by all California Environmental Quality Act (CEQA) regulations and other applicable federal, State, and local laws." DEIS at 4.10-8. CEQA, however, is a fundamental California land use and environmental planning law that requires a project applicant to mitigate all significant environmental impacts when feasible. NEPA and the Tribal-State compact require that such a CEQA review occur within the same NEPA environmental document, and not be deferred to a later date. By deferring all CEQA analysis to a later date, BIA failed to undertake a comprehensive review of environmental impacts and associated mitigation measures as required by NEPA and the Tribal-State Compact.

Indeed, BIA appears to have intentionally avoided a comprehensive analysis of state and local considerations caused by on- and off-site project improvements. During scoping, BIA ignored CalTrans' assumption that "there will be a corresponding or joint California Environmental Quality Act (CEQA) document that will address the CEQA required mitigations and requirements for any significant impacts this project may have." BIA also rejected the County's comments on the Administrative Draft EIS that was circulated in March 2019, where the County warned BIA that

I90-29

the Project's full environmental impacts could not be determined accurately until the County and Tribe negotiated a mitigation agreement. County Comment Letter (June 11, 2019) at 1. Contrary to the certainty expressed in the DEIS, the City has pointed out that its provision of electricity, water supply, and wastewater services remains "at the discretion of the Redding City Council," and thus subject to CEQA and the mitigation of all significant environmental impacts, where feasible. City Comment Letter (May 22, 2019) at 3-4. The City and County have also raised a number of additional points where the DEIS environmental analysis has continued to lag behind what NEPA and CEQA require. Against the recommendations and rebuffing the assistance of these cooperating agencies, BIA failed to undertake a complete environmental review and incorporate appropriate mitigation measures into the DEIS.

I90-29 (Cont.)

It is thus clear that the DEIS would not pass muster under either NEPA or CEQA, for the reasons mentioned above. Several of the DEIS "mitigation measures" (including traffic/transportation and water quality permits and certifications) would constitute unlawful "deferred mitigation" under CEQA because they are too vague to meaningfully inform whether the mitigation would be effective. The water supply and wastewater analysis in DEIS Appendix B is insufficient to meet the standard of a CEQA Water Supply Assessment that would be required of a project this size. By deferring analysis of many issues associated with off-site traffic, water quality, and other impacts caused by the Proposed Project, the DEIS fails to consider the "whole of the action" associated with developing and operating the casino, hotel, amphitheater, leach field, and other aspects of the Proposed Project. There appears to be no Memorandum of Understanding with any of the cooperating agencies, as recommended by both CEQ regulations and CEQA guidelines. 40 CFR 1506.2; CEQA Guidelines § 15222.

I90-30

By analyzing the fee-to-trust action only, the DEIS improperly segments the NEPA analysis by failing to give a "hard look" to the other federal, state, and local actions required to develop the casino. Failing to analyze environmental impacts and proposed mitigation under CEQA has resulted in BIA improperly segmenting the Project to avoid full consideration of state and local needs. *See Lange v. Brinegar*, 625 F.2d 812, 815 (9th Cir. 1980).

I9-31

b. <u>The BIA Must Correct the Deficiencies and Recirculate the DEIS</u>

Given the substantial deficiencies in the DEIS, BIA has no choice but to supplement its environmental analysis to comply with CEQA and incorporate meaningful mitigation measures, and recirculate the document. NEPA requires agencies to supplement a draft environmental impact statement if: (i) the agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. 40 C.F.R. § 1502.9(c)(1)(i-ii).

I90-32

A "longstanding" Ninth Circuit rule is that an "'impact statement should provide the public with information on the environmental impact of a Proposed Project as well as encourage public participation in the development of that information.'" *California v. Block*, 690 F.2d 753, 772 (9th Cir. 1982) (quoting *Trout Unlimited, Inc. v. Morton*, 509 F.2d 1276, 1282 (9th Cir. 1974)). If a DEIS

is so incomplete or misleading that the public cannot make an informed comparison of alternatives, NEPA requires the EIS be revised to provide a reasonable, good faith, and objective analysis. *Ctr. for Biological Diversity v. Bureau of Land Mgmt.*, 422 F. Supp. 2d 1115, 1120 (N.D. Cal. 2006). Here, the deficiencies in the DEIS fails to provide the public with information on the environmental impact of the Tribe's Proposed Project, and the BIA must supplement its environmental analysis accordingly and recirculate the DEIS for public review.

I90-32 (Cont.)

VIII. The Redding Rancheria cannot bypass the Indian Gaming Regulatory Act's (IGRA) two-part determination requirement because Strawberry Fields does not qualify as "restored lands" under IGRA.

The Indian Gaming Regulatory Act (IGRA) prohibits gaming on lands taken into trust by the Secretary of Interior (Secretary) after October 17, 1988, subject to limited exceptions. 25 U.S.C. § 2719. The primary exception, and the only one applicable here, is known as the Secretarial "two-part determination" exception. Under this exception, the Secretary may take land into trust after October 17, 1988 for gaming purposes only after (1) consulting with state and local officials, including nearby Indian tribes, and (2) obtaining the state governor's concurrence with the decision to take the land into trust for gaming purposes. 25 U.S.C. § 2719(b). The Secretary must determine, after consultation with state, local, and tribal officials, that the gaming establishment on the new lands would be in the best interests of the tribe seeking to game on the land and would not be detrimental to the surrounding community. *Id.* The standard two-part determination is the appropriate way for the Secretary to process and approve or deny the Redding Rancheria's fee-to-trust application here.

Instead of following the legally proper path for reviewing and making a final determination on the Redding Rancheria's application, however, the Secretary and the Redding Rancheria are attempting to shoehorn the Tribe's application into an exception to IGRA's general prohibition on gaming that does not require consultation with state, local, or tribal officials or the state governor's approval. The exception, known as the "restored lands" exception, allows gaming on lands "taken into trust 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). To qualify for this exception, a tribe must show, among other things, (1) that the subject "land is included in the tribe's first request for newly acquired lands since being restored to Federal recognition" or (2) that the "tribe submitted an application to take the land into trust within 25 years after the tribe was restored to Federal recognition ***and the tribe is not gaming on other lands***." 25 C.F.R. § 292.12 (emphasis added). The Redding Rancheria, of course, is gaming on other lands[8]—it owns and operates the Win-River Resort &

I90-33

[8] In addition to the fact the Redding Rancheria is already gaming on other lands, a portion of the lands (approximately 80 acres) included in the Tribe's pending application may not have been part of the Tribe's fee-to-trust application until after 25 years had passed since the Tribe was restored to federal recognition. "The Redding Rancheria was restored on June 11, 1984, and applied for the Restored Lands exception on March 10, 2009, a few months before its eligibility under [DOI's] expired on June 11, 2009." Letter from John Tahsuda, Principal Deputy Assistant Secretary—Indian Affairs, to the Hon. Dianne Feinstein, U.S. Sen. (Feb. 28, 2019), *available at* https://www.standupca.org/off-reservation-gaming/contraversial-applications-in-process/redding-rancheria/february-28-2019-doi-letter-to-senator-feinstein (last visited

Casino (Win-River) on its reservation, just over three miles from the Strawberry Fields site. The Tribe, therefore, cannot satisfy a key requirement of the "restored lands" exception and the Secretary must follow the "two-part determination" requirement for processing the Tribe's fee-to-trust application.

I90-33 (Cont.)

While it is understandable that the Redding Rancheria would prefer to dispense with the requirement to consult with state, local, and tribal officials and obtain the governor's concurrence, there are no factually or legally defensible reasons for the Secretary to do so here. The Secretary should process the Redding Rancheria's fee-to-trust application under the normal two-part determination process for lands taken into trust after October 17, 1988.

a. The plain language of the regulations are clear that the "restored lands" exception does not apply to a tribe that is already gaming on other lands.

The regulations are written in clear, present tense language: "and the tribe ***is*** not gaming on other lands." 25 C.F.R. § 292.12(c)(2) (emphasis added). Indeed, as recognized by the Department of Interior (DOI) in litigation at the Ninth Circuit, the regulation "makes no exception for whether the tribe will be gaming on other lands in the future. . . . [T]he regulations are clear, and contain no provision for an expression of future intent with an undefined time frame."[9] At least one Ninth Circuit Judge observed this as well: "The subsection directs the Secretary to look at what is happening, not what might happen in the future."[10] Had DOI meant to incorporate a future intent aspect into the "restored lands" exception, then the rule would say something like, "and the tribe ***will not be*** gaming on other lands after the new lands are taken into trust for gaming purposes and new gaming operations are established on the new lands." That, however, is not what the regulations say. The plain language of the regulations make clear that a tribe that *is*—as opposed to *will be*—gaming on other lands does not qualify for IGRA's "restored lands" exception. Put simply, the Redding Rancheria cannot make use of the "restored lands" exception to circumvent IGRA's standard two-part determination because it *is* gaming on other lands.

I90-34

This reading of the regulation comports with the fact that the temporal connection the tribe must show under IGRA is between (1) "the date of the acquisition of the land" and (2) "the date of the tribe's restoration." 25 C.F.R. § 292.12. The temporal connection requirement is not related to when the tribe starts gaming on the new land. Thus, Redding Rancheria's offer to cease its operations at Win-River once the new Strawberry Fields casino is up and running has no affect

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June 11, 2019). More than 25 years after it was restored to recognition, "[t]he Tribe amended its request in July 2010 to include the Adjacent 80 Acres." *Letter Decision regarding Redding Rancheria's Request for "Restored Lands" Determination on "Strawberry Fields" and the 'Acjacent 80 Acres"* (U.S. Dep't of Interior, Dec. 22, 2010), *available at* https://www.nigc.gov/images/uploads/indianlands/Redding%20Final%20Decision%20Letter.pdf (last visited June 11, 2019).

[9] Answering Brief of Federal Appellees (Sept. 28, 2012), *Redding Rancheria v. Salazar*, No. 12-15817, Dkt Entry 23 Pages 59–60.

[10] *Rancheria v. Jewell*, 776 F.3d 706, 719-720 (9th Cir. 2015) (Callahan, C.J., dissenting).

on the Secretary's processing of the Tribe's fee-to-trust application. If the Tribe wanted to qualify for the "restored lands" exception, then it should have made that offer and shutdown Win-River before it submitted its fee-to-trust application. Under those circumstances, the Tribe would not have not been gaming on other lands and may have qualified for the "restored lands" exception.[11] That, however, is not what happened. Instead, the Redding Rancheria *is* gaming on other lands and thus cannot take advantage of IGRA's "restored lands" exception.

I90-34 (Cont.)

This reading of the regulation is also consistent with the rulemaking history leading up to DOI's publication of the final rule in the federal register. In DOI's notice of proposed rulemaking, the "restored lands" exception did not contain the "and the tribe is not gaming on other lands" proviso. Gaming on Trust Lands Acquired After October 17, 1988, 71 Fed. Reg. 58,769-01, 58,774 (Oct. 5, 2006). It simply stated: "The tribe submitted an application to take land into trust within 25 years after the tribe was restored to Federal recognition." *Id.* At that point, the language of the proposed rule did not account for a tribe's other gaming operations. During the comment period, DOI received a comment requesting DOI to revise the rule "to ensure that [the "restored lands" exception is] not used by a tribe which is ***already*** gaming." Gaming on Trust Lands Acquired After October 17, 1988, 73 Fed. Reg. 29,354-01, 29,367 (May 20, 2008) (emphasis added). DOI adopted the commenter's recommendation by adding the "and is not gaming on other lands" language to 25 C.F.R. § 292.12(c)(2). *Id.* at 29,367, 29,378. The rule was intended to ensure that a restored tribe that was already gaming on other lands could not use the "restored lands" exception to leapfrog from site to site within the first 25 years of its recognition being restored. Thus, tribes that are already gaming on other lands, like the Redding Rancheria, cannot take advantage of the expedited fee-to-trust process allowed under the "restored lands" exception. DOI must therefore process the Redding Rancheria's application pursuant to IGRA's two-part determination requirement.

I90-35

b. Allowing the Redding Rancheria to avoid the two-part determination requirement does not advance IGRA's purposes.

Congress passed IGRA on October 17, 1988 to, among other things, "provide a statutory basis for the operation of gaming by Indian tribes as a means of promoting tribal economic development, self-sufficiency, and strong tribal governments." 25 U.S.C. § 2702. Congress also sought to balance state and local interests that might be affected or harmed by tribal gaming facilities. One way in which Congress ensured the protection of state and local interests was by establishing a general prohibition on gaming on trust lands acquired after IGRA was enacted, unless the Secretary of Interior (1) consults with state, local, and tribal officials and (2) obtains the governor's concurrence. 25 U.S.C. § 2719. Recognizing that this prohibition would work to the detriment of tribes that did not have trust lands as of October 17, 1988, Congress included the "restored lands"

I90-36

[11] Assuming, among other things, that the Redding Rancheria submitted its application to take the land into trust within 25 years after it was restored to federal recognition. 25 C.F.R. § 292.12(c)(2). As noted in footnote 1, a portion of the lands (approximately 80 acres) in the Redding Rancheria's current application were not part of the Tribe's application until after 25 years had passed since the Tribe was restored to federal recognition.

exception "to promote parity between established tribes, which had substantial land holdings at the time of IGRA's passage, and restored tribes, which did not." *Rancheria v. Jewell*, 776 F.3d 706, 711 (9th Cir. 2015). The "restored lands" exception thus placed tribes that did not have established gaming operations prior to IGRA on a level playing field with those that did. The Secretary, however, must "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.* at 711.

I90-36 (Cont.)

IGRA permits tribes to use net revenues from gaming establishments for specified purposes designed to achieve IGRA's goals of promoting tribal economic development, self-sufficiency, and strong tribal governments. "[N]et revenues from any tribal gaming are not to be used for purposes other than—(i) to fund tribal government operations or programs; (ii) to provide for the general welfare of the Indian tribe and its members; (iii) to promote tribal economic development; (iv) to donate to charitable organizations; or (v) to help fund operations of local government agencies." 25 U.S.C. § 2710(b)(2)(B) (class II gaming); 25 U.S.C. § 2710(d) (class III gaming). If a tribe's gaming operations meets these purposes, then a tribe may use net revenues to make per capita payments to its members. 25 U.S.C. § 2710(b)(3) (class II gaming); 25 U.S.C. § 2710(d) (class III gaming). But only if (1) the tribe has prepared and the Secretary has approved a plan to allocate casino revenues consistent with the requirements of 25 U.S.C. § 2710(b)(2)(B), (2) the interests of vulnerable tribal members who are entitled to per capita distributions are adequately protected, and (3) the tribe notifies its members that the per capita payments are subject to federal taxation. 25 U.S.C. § 2710(b)(3) (class II gaming); 25 U.S.C. § 2710(d) (class III gaming).

I90-37

Here, the Redding Rancheria already has a profitable casino on trust lands. The Tribe has notably benefited from the ability to establish and operate Win-River post October 17, 1988,[12] and as a result, has been using the profits from that establishment to promote its tribal economic development, self-sufficiency, and government since 1999. Presumably, Win-River has allowed the Tribe to achieve IGRA's defined goals—since, as of at least 2004, the Redding Rancheria has apparently been able to distribute annual per capita payments to its members of approximately $35,000.[13] To put that payout into perspective, the average annual income of a resident of the city of Redding as of 2016 was approximately $26,000 and projects to be approximately $28,000 as of 2021.[14] The average annual income in Shasta County as of 2016 was also slightly less than

I90-38

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[12] *Rancheria v. Jewell*, 776 F.3d at 709 ("The United States accepted the Tribe's trust-to-trust transfer request for these parcels in 1992, and the Tribe began operating a small casino, known as the Win–River Casino, on the 2.3 acre parcel after entering into a gaming compact with the state of California in 1999.").

[13] *See DNA wasn't convincing for Redding Rancheria*, Indianz.com (Feb. 20, 2004), https://www.indianz.com/News/2004/02/20/dna_wasnt_convi.asp (last visited June 11, 2019). According to the Redding Rancheria's Distribution Ordinance, the Tribe distributes 60% of its share of the Win-River's net revenues to its members in the form of per capita distributions. *Regulation of Class II Gaming, Use of Gaming Revenues*, Ordinance No. 5-27-99, Section 1000(5) (May 27, 1999, last amended 2001), available at https://narf.org/nill/codes/redding/redddistribution.html (last visited June 11, 2019).

[14] Redding Rancheria Fee-to-Trust and Casino Project Draft Environmental Impact Statement, Appendix A at 17. *See also Economy in Redding, California*, BestPlaces.net,

$26,000 and projects to be just under $28,000 in 2021.[15] In sum, because of the revenues generated by Win-River, the Redding Rancheria is already economically developed and self-sufficient, with a strong tribal government.

It follows that the primary purpose of the Strawberry Fields facility must be to increase the size of the per capita distributions currently received by members of the Redding Rancheria. Per capita payments are, however, an ancillary benefit of IGRA and allowed only after tribal gaming operations achieve IGRA's primary purposes. While approving the Strawberry Fields project does not necessarily violate the purpose of IGRA, it is questionable whether it is necessary to fulfill IGRA's primary purposes. In this light, the Secretary should weigh adverse effects documented by concerned citizens, both tribal and non-tribal, heavily. The Secretary and the Redding Rancheria have not shown why making the Tribe's members wealthier—through a federally sanctioned increase in their per capita casino income via an improper use of the "restored lands" exception—is justified in consideration of the countervailing adverse effects that the federal action and expanded casino operations at Strawberry Fields will have on the surrounding community.

I90-38 (Cont.)

If the Tribe wants to obtain additional benefits from the options provided by IGRA to expand its gaming operations, it must pursue the same process that similarly situated tribes are required to follow—the Secretarial two-part determination. Consistent with IGRA, this would ensure the full and complete consideration of state, local, and tribal interests, along with those of the Redding Rancheria itself. Anything else would impermissibly allow the Redding Rancheria to take advantage of the "restored lands" exception to the detriment of the surrounding community, including other tribes, in contravention of IGRA.

I90-39

c. A court would not defer to the Secretary's incorrect interpretation and application of the "restored lands" exception.

In this case, where the Secretary's interpretation conflicts with both the ordinary meaning of the regulation's plain language and the purpose of the "restored lands" exception, as well as IGRA more broadly, a reviewing court would not defer to the Secretary's decision to process the Redding Rancheria's application under the "restored lands" exception. *Pres. of Los Olivos, et al., v. U.S. Dep't of Interior*, 635 F. Supp. 2d 1076, 1090 (C.D. Cal. 2008) ("[A]lthough courts will defer to an agency's construction of a regulation that is ambiguous, deference is not required when the agency's interpretation is inconsistent with the plain language of the regulation itself, conflicts with the agency intent at the time of promulgation, or exceeds the statute's limits."). Instead, a court would likely remand to the Secretary for further proceedings consistent with IGRA's two-part

I90-40

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https://www.bestplaces.net/economy/city/california/redding (last visited June11, 2019) (estimating the average annual income for a Redding resident to be less than $24,000).

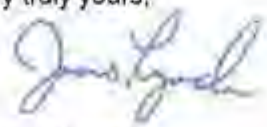
[15] Redding Rancheria Fee-to-Trust and Casino Project Draft Environmental Impact Statement, Appendix A at 17. *See also Economy in Shasta County, California*, BestPlaces.net, https://www.bestplaces.net/economy/county/california/shasta (last visited June 11, 2019) (estimating the average annual income for a Shasta County resident to be less than $24,000).

determination requirement. *Id.* at 1096. To avoid this obvious and unnecessary result, the Concerned Neighbors urge the Secretary to proceed with the proper two-part determination now.

I90-40 (Cont.)

On behalf of the Concerned Neighbors, thank you for your time and consideration of the forgoing comments. Please feel free to contact me at the number provided above if you have any questions regarding these comments.

Very truly yours,



James M. Lynch
K&L Gates LLP

Attachments:

1. Attachment A - List of Concerned Neighbors
2. Attachment B - Traffic Impact Analysis Technical Memo

ATTACHMENT A

Concerned Neighbors, Business Owners, and Community Members

1. Ken Wood, Owner of North State Hearing
2. Timothy Thomas, Impacted Neighbor
3. Ed Shaw, Owner of Cook Concrete
4. Joe Furnari, Churn Creek Bottom Homeowner
5. John Dunlap, Impacted Neighbor
6. Steven Hill, Churn Creek Bottom resident
7. Bruce Haynes, Impacted Neighbor
8. Brenda Haynes, Churn Creek Bottom Homeowners & Friends
9. Lyle Tullis, Tullis Inc., Impacted Neighbor
10. Al Shufelberger, Owner of Redding Lumber Transport, Inc
11. Richard Downs, Redding Realty, Impacted Neighbor
12. Alan T. Hill, Impacted Neighbor
13. Sara Frost, Churn Creek Bottom Homeowner
14. Carolyn Shaw, Churn Creek Bottom Homeowner
15. Rod Evans, Churn Creek Bottom Homeowners & Friends
16. Dan Frost, Churn Creek Bottom Homeowner
17. Christian M. Carmona, Churn Creek Bottom Homeowner
18. Stephanie R. Carmona, Churn Creek Bottom Homeowner
19. Randy C. Carter, Ret. Fire Captain, Redding Fire Department
20. Laurie S. Carter, Churn Creek Bottom Homeowner
21. Ruth M. Helton, Shasta County Resident 92 years
22. Barbara J. Boyer, Shasta County Resident 88 years
23. Christine R. Presta, Shasta County Resident 59 years

24. Dr. Brian Nilges, Churn Creek Bottom Homeowner
25. Katie Nilges, Churn Creek Bottom Homeowner
26. Olivia Nilges, Churn Creek Bottom Homeowner
27. Rob Cronich, Churn Creek Bottom Homeowner
28. Kristy Lanham, Churn Creek Bottom Homeowner
29. Todd Giles, Churn Creek Bottom Homeowner
30. Shannon Giles, Churn Creek Bottom Homeowner
31. Dr. Richard Malotky, Impacted Neighbor
32. Tiger Michiels, Churn Creek Bottom Homeowner
33. Susan Michiels, Churn Creek Bottom Homeowner
34. Joe Hedayattzadul, Concerned Citizen of Redding
35. Jeff Darling, Owner of Darling Accounting
36. Amelia Ward, Concerned Citizen of Redding
37. Dennis Ward, Concerned Citizen of Redding
38. Karen Edkin, Concerned Citizen of Redding
39. Tom Stovall, , Concerned Citizen of Redding
40. Edward Tam, Concerned Citizen of Redding
41. Rod Evans, Churn Creek Bottom Homeowners & Friends
42. Jeb Allen, Owner of Palomar Builders
43. Joe Baker, Impacted Neighbor
44. Denise Baker, Impacted Neighbor
45. Mike Chittim, Bonnyview Bechelli Coalition
46. Tom Mancuso, Bonnyview Bechelli Coalition
47. Freeda Watenpaugh, Wintu Tribe, Churn Creek Bottom resident

48. Chris Begley, Bonnyview Bechelli Coalition
49. Diane Abair, Real Estate Broker, Bonnyview Bechelli Coalition
50. Mary Ocasion, Churn Creek Bottom Homeowners & Friends
51. Dr. Harry Daniels, Retired Physician, Impacted Neighbor (living within 1/2 mile of the proposed project)
52. Mark Coulter, Impacted Neighbor
53. Janet Coulter, Impacted Neighbor
54. Cathy Kneer, Community Leader
55. Tom Reemts, Churn Creek Bottom Homeowners & Friends
56. Gary Bossuot, Impacted Neighbor (living within 1/2 mile of the proposed project)

ATTACHMENT B

translutions, inc.
17632 Irvine Boulevard, Suite 200
Tustin, California 92780
Phone (949)656-3131 Fax (949)445-3131
solutions@translutions.com

June 17, 2019

Mr. Buck B. Endemann, Partner
K&L Gates LLP
4 Embarcadero Center, Suite 1200
San Francisco, California 94111

Subject: Comments on the Traffic Impact Study Included in the Draft Environmental Impact Statement for the Redding Rancheria Fee-to-Trust and Casino Project

Dear Mr. Endemann:

Translutions, Inc. (Translutions) is pleased to present this letter summarizing our findings from the review of the Traffic Impact Study (TIS) included in the Draft Environmental Impact Statement (DEIS) for the Redding Rancheria Fee-to-Trust and Casino Project. The TIS was prepared by Kimley-Horn dated June 2018.

The TIS evaluates three sites for the proposed project – the Strawberry Fields Site, Anderson Site, and Win River Casino Site. These comments are generally on the Strawberry Fields Site, though some comments are also applicable to the other sites. For the Strawberry Fields Site, the TIS evaluates four land use alternatives and three access alternatives. The four land use alternatives evaluated are:

- Alternative A: Proposed Project
- Alternative B: Proposed Project with No Retail Alternative
- Alternative C: Reduced Intensity Alternative
- Alternative D: Non-Gaming Alternative

This review focuses on the Proposed Project (Alternative A). Alternative A consists of a new casino and resort, including an approximately 69,515 square foot casino, 250-room hotel, an event/convention center, and a retail center. In addition, the following three project access options were evaluated for each land use alternative on the Strawberry Fields Site:

- North Access Only – access to South Bonnyview Road via Bechelli Lane
- North and South Access – access to South Bonnyview Road via Bechelli Lane and access to Smith Road via a new connecting roadway (overpass only at Smith Road)
- South Access Only – access to Smith Road via a new connecting roadway and a new I-5 Interchange at Smith Road

The DEIS states that the preferred access alternative is the "North Access Only" alternative.

This letter has two main sections.

1. Comments on the Project Circulation; and
2. Comments on the Traffic Impact Study Report

SECTION 1. COMMENTS ON PROJECT CIRCULATION

The DEIS states that the preferred access option is the North Access Only option where access to the project is provided on Bonnyview Road via Bechelli Lane. Bechelli Lane is a narrow two-lane roadway in the vicinity of the project site. Further, the intersection of Bonnyview Road and Bechelli Lane is barely 700 feet from the interchange to the Interstate 5 (I-5) freeway and is one of the busiest interchanges in the City of Redding. Such a congested interchange is prone to queue overflows. Accounting for the casino, event center, conference center, hotel, and retail uses, it is anticipated that the project will have several thousand employees and guests on site during peak operating hours. It is unclear how so many people will be evacuated in case of a fire or other emergency via one access only, which is extremely close to a busy interchange.

The City of Redding has recommended that a Divergent Diamond Interchange (DDI) be constructed when the Bonnyview Road interchange is improved, with proposed roundabouts at the intersections of Bonnyview Road with Bechelli Lane and

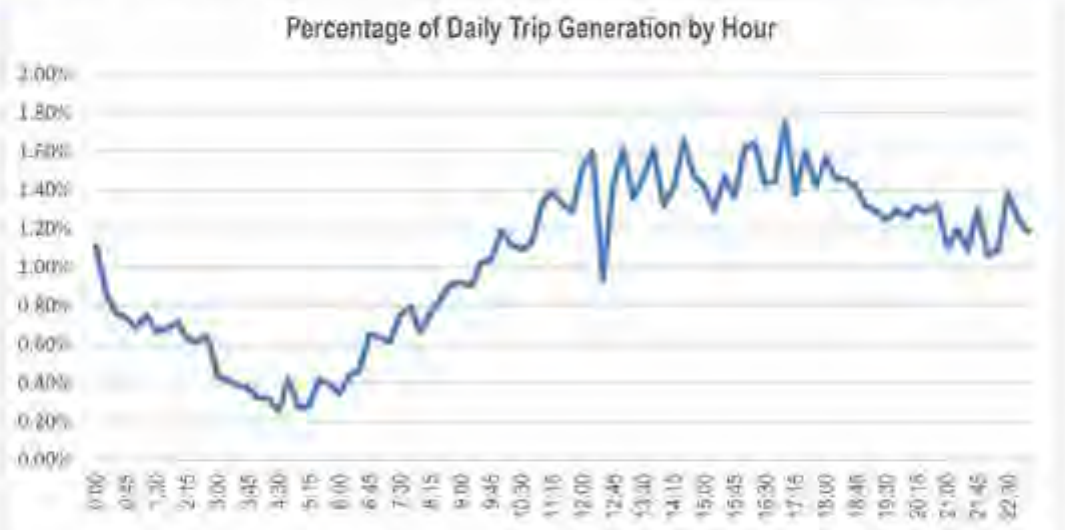
Churn Creek Road. The City has also recommended that Bechelli Lane remain a two-lane roadway. The proposed project appears to contradict the City's plans for the area. The TIS also does not evaluate the roundabouts and the DDI, which are planned by the City. It is likely that under the DDI/Roundabout scenario, vehicles exiting the project could potentially be trapped on the lane to connecting to the I-5 Southbound On-Ramp, especially since the distance between Bechelli Lane and the ramp is reduced further under the DDI/Roundabout Scenario. In addition, the proposed project is likely to exhaust the entire capacity of the planned one-lane on ramp to the I-5.

Given the size of the project, it is clear that at least two access points are required. However, access to the south via Smith Road is infeasible because Smith Road is a residential street and based on the City's TIS Guidelines, access and livability are of primary importance in residential streets, which would be impacted by the proposed project should a southerly access be proposed.

SECTION 2. COMMENTS ON THE TRAFFIC IMPACT STUDY REPORT (TIS)

The TIS evaluates 10 intersections for the Strawberry Fields Site. Caltrans and most municipal agencies use 50 peak hour project trips as a screening threshold for potential impacts. Based on the number of trips generated by the project, in addition to the 10 intersections evaluated, the study should be revised to include intersections where the project could potentially add 50 or more peak hour trips.

Based on the review of the traffic counts, it appears that the Friday analysis was conducted for 5:00 p.m. to 7:00 p.m. Translutions has reviewed survey data from three casinos from Riverside County (https://www.cathedralcitycasino.com/draft-ea-teir/). The graph below shows the hourly distribution of daily traffic for three casinos in Riverside County.



As seen on the graph, trip generation during the p.m. peak hour and the hour between 5:00 to 7:00 p.m. are very similar. Since traffic volumes on street are highest during the traditional 4:00 to 6:00 p.m. period, the project impacts during the traditional peak hours are likely to be higher since the higher on street traffic volumes lead to decreased residual capacity. For example, at the intersection of Bonnyview Drive & I-5 SB ramps, the peak hour from the Costco EIR shows that the p.m. peak hour begins at 4:30 p.m. and the traffic volumes are 12% higher than the peak hour between 5:00 p.m. to 7:00 p.m. disclosed in this study. It should be noted that the Shasta County General Plan, City of Redding TIS Guidelines, and Caltrans TIS Guidelines all require evaluation of the traditional peak hours which were not conducted, resulting in minimization of potential impacts.

It appears that the traffic counts were conducted in July 2016. Schools in the area were closed during that period. Summer traffic patterns are different and generally have lower traffic volumes. It is recommended that the analysis be conducted using traffic counts when schools are in session, and for the traditional peak hours.

A comparison of Casino Survey data shows that the trip generation of the casino during the weekday p.m. peak hour of adjacent street traffic is only 16% less than the one hour of highest street traffic on Saturday 5:00 p.m. to 7:00 p.m. The Riverside County survey data also shows that the Saturday daily trip generation is almost 39% higher than the weekday trip generation. The Project Trip Generation for Strawberry Fields (Table 16 of the TIS) shows that the Saturday trip generation is lower than the Friday trip generation. It should be noted that the TIS states that the trip generation for tribal gaming facilities generally peaks on Saturday evenings. At the least, this discrepancy shows that the percentage of weekday trips occurring during the traditional weekday peak hour is substantially higher as a percentage of daily trip generation. Table 16 also shows that the peak hour of Saturday traffic is approximately 7% of the daily traffic, which shows that trips are spread out more evenly throughout the day, potentially peaking at some other time than the hours analyzed. This should be explained in the study, and the traditional peak hours should be evaluated.

The project trip generation is confusing. The report text states that for Alternative 1, (The Project) "Consists of a new casino and resort, including an approximately 69,515 square foot casino, 250-room hotel, an event/convention center, and a retail center, as well as associated parking and infrastructure". However, the trip generation table (see below) lists a lesser area for the casino (48,060 square feet). It is unclear why almost 25% of the space is being ignored. It is also unclear if the independent variable in the survey excluded appurtenant spaces.

The trip generation rates used for the Hotel component of the of the project uses approximately a quarter of the rates from the ITE Trip Generation Manual. The report states that ¾ of the hotel guests are likely to be part of the casino. Since the casino trip generation is based on actual surveys of the casino itself (and the Win River Casino has an attached resort) trips from the hotel are being understated in this analysis. Further, the report says that 25 percent of the 250 on-site hotel rooms would be occupied by event attendees with an average occupancy of 1.3 attendees per room, resulting in 81 attendees staying on-site, and not driving to/from an event. It appears that the TIS is saying that the hotel would effectively generate no new trips. This is counterintuitive, since the site could be used for retreats and training, as well as public meetings.

The DEIS states that most of the trips from the conference center would be outside of the peak hours. Typically, such facilities also host seminars, conferences, continuing education classes etc. which result in a high number of a.m. and p.m. peak hour trips. Using attendee numbers disclosed in the TIA, there could be as many as 490 attendees to the Conference Center after accounting for on-site guests, which could result in as many as 490 peak hour inbound trips. The proposed Conference Center could have over 60 supporting staff and related trips. Such events also generate substantial trips during the peak hours for both employees and attendees, and do not occur during off-peak hours as stated in the DEIS.

The TIS also states that 70 percent of the event center attendees would be on site at the Casino. This is a very high number, and potentially understates trips significantly. In fact, 30% of 1,800 results in 1,260 attendees. Applying an AVO of 2.2 used in the TIA, 572 trips are anticipated. When associated staff trips are included, the number of trips could be more than 750 during the peak hour, which is more than the trip generation of the Casino portion of the project. It is also unclear if events were held on the days surveys were conducted at the Win River Casino. If an event was not held on that day, it would mean that the observed trips to the casino are in addition to event venue since it is unlikely that the casino will turn non-event attendees away.

The TIS uses an Average Vehicle Occupancy (AVO) of 2.2 for the Event Center and conference center. For special events such as work conferences, seminars, and conference events, the AVO is typically lower than 2.2, because most attendees are likely to arrive in single occupancy vehicles, or with family not attending the event. A lower number will result in higher trip generation. Please provide an explanation or source for the 2.2 AVO used in the analysis, or update the analysis as needed. In addition, as discussed above, an AVO based analysis ignores trips made by staff. Typically, approximately 10 staff members are required for every 100 event attendees, which would result in 180 staff members. This is a fairly high number and cannot be ignored. Such events also generate substantial trips during the peak hours, and do not occur during off-peak hours as stated in the DEIS.

The trip generation for the casino component was based on survey data from Win River Casino. The trip generation table states that the number of gaming position is used as the independent variable for the purposes of estimating trip generation. The total number of gaming positions should be disclosed/documented (slots, table games, etc. dining seating) and compared to trip rates on a gross floor basis. As the number gaming positions/seats is reflective of the total person capacity sometimes this results in an under representation of trip generation depending upon the casino operator. In addition, since the proposed project is substantially closer to the freeway than the Win River Casino (0.25 miles compared to over 3 miles), it is likely that more trips would divert from the freeway to the proposed Casino. The trip generation should be adjusted to reflect a higher rate.

The TIS mentions that the trip distribution was based on Wi-Fi surveys, but doesn't detail the methodology used for the survey. Wi-Fi based surveys are generally inaccurate for various reasons including auto-turn off features, Trusted Network algorithms, etc. We recommend that the trip distribution be explained in more detail or reevaluated by a more reliable methodology.

Page 8 of the TIS lists the thresholds and impact criteria for City of Redding and the County but does not identify direct project impacts. This is in spite of several locations going from acceptable operations to unacceptable operations once project trips are added, and the project related vehicle-to-capacity and delay increases being substantially higher than the thresholds, the TIS does not identify direct impacts.

The TIS uses the City of Redding guidelines to identify fair shares for improvements under cumulative conditions but ignores the guidelines where it states that the project is 100% responsible for mitigating existing plus project impacts. In fact, the TIS does not even analyze an Existing Plus Project scenario and deems all impacts and mitigation measures as cumulative, subject to fair share payments. An existing plus project scenario should be evaluated, and impacts disclosed.

The Guidelines also require evaluation of intersection queuing and sufficiency of left turn storage. The TIA does not include queuing analysis or turn lane storage evaluations for intersections. Recommend results be provided. It is also unclear how the queuing interactions will impact closely spaced intersections. The Caltrans TIS Guidelines requires the use of the latest edition of the Highway Capacity Manual for all analyses. However, the TIS uses HCM 10th Edition and not HCM-6.

CONCLUSIONS

The TIS appears to be deficient in terms of disclosure of impacts. The above comments can be summarized into the following categories:

1. **Project Circulation.** The preferred Access Alternative will make it difficult for vehicles exiting the project, especially when the Bonnyview Road interchange is improved to the DDI with roundabouts at Bechelli Lane;
2. **Safety Impacts.** The preferred Access Alternative will make it difficult to evacuate the large number of people and property in case of a fire event or other natural disaster;
3. **Analysis Time Period.** The project does not identify impacts to traffic during the peak hour of adjacent street traffic, when impacts are most apparent even if the project trip generation is lower than the peak hour of generator. All traffic study guidelines (Caltrans, Redding, Shasta County) require analysis of peak hour conditions. As demonstrated by the Riverside County surveys, weekday trip generation during the p.m. peak hour of adjacent street traffic, although lower than the trip generation during weekend peak hour of generator, is still substantial and once evaluated in conjunction with the higher background traffic volumes could result in more impacts;
4. **Existing Counts.** The traffic counts were conducted when schools were not in session, resulting in substantially lower baseline counts;
5. **Project Trip Generation.** The project trip generation takes credits for "complementary" land uses, uses a high AVO, ignores employee trips, and generally underestimates project trip generation;
6. **Study Area.** The TIS evaluates 10 intersections for the Strawberry Fields Alternative when there are hundreds of peak hour trips at intersections not included in the analysis. Impacts at all intersections where the project could have potential impacts should be analyzed and impacts disclosed;
7. **Analysis Methodology.** The TIS does not evaluate effects of queues and left turn storage;

8. **Impact Determination.** The TIS ignores City of Redding Guidelines which require identification of direct project impacts from a project based on a comparison of existing and existing plus project conditions. The TIS does not include an Existing Plus Project scenario. The TIS also fails to apply thresholds listed in the TIS to identify adverse project impacts;
9. **Mitigation Measures.** The TIS identifies payment of fair share fees for all impacts and does not identify any mitigation measures to offset direct project impacts.

We trust you will find this helpful in your planning process. If you have any questions, please contact me.

Sincerely,

translutions, inc.

Sandipan Bhattacharjee, P.E., AICP
Principal

Comment Letter I91

John C. Dunlap Consulting Engineer
4211 Frances Dr. Redding CA 96001 (530) 243-2557 jcdoer@charter.net

Structural Engineer
Civil Engineer

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

Re: Proposed Redding Rancheria Fee-to-Trust and Casino Project, Draft EIS, by email and post.

Please include my comments and concerns in the responses to the subject document.

My particular concern is the disposal of the effluent from the proposed wastewater treatment system. The Strawberry Field site is directly adjacent to the Sacramento River. In addition, it sits above a major ground water aquifer with a surface that varies from 16 feet to 30 feet below the average ground level. The level of filtration is minimal, and adding fill is of little benefit.

The proposed Class V underground injection system for the effluent from the wastewater treatment system is totally inconsistent with the critically necessary projection of both this aquifer and the adjacent Sacramento River. In addition, substantial portion of the site sits in the 100 year flood plain area. The proposed wastewater system would include a sizable holding pond in an area slightly above the flood plain, for the effluent occurring during flooding periods and to be disposed of when the flooding subsides. Even if totally lined, this pond has the probability of leaching into the aquifer and also the River. I91-01

The EPA requirements for the Stillwater Wastewater Treatment Plant, located directly adjacent to the Sacramento River a few miles downstream from this site, specified the effluent to be from a tertiary treatment process.

This proposed project has a 250 room hotel in addition to the gaming and retail areas, and is directly adjacent to Interstate 5. As a result it is very identifiable source for disease vectors and serious contamination drawn from a huge geographical area. The wastewater effluent produced from this site, regardless of the primary treatment, should be only of the highest quality. This will not be the case with regard to the proposed system. I91-02

Considering the importance of the Sacramento River as the major contributor to the domestic water supply for most of California, the permitting of an underground disposal injection system at this site is absolutely unacceptable.

The proposed wastewater system for this project should be rejected in its entirety. If it is not, no doubt outside inspection efforts, including the continuing analysis of both the aquifer and the River, will occur. This could result in the Rancheria Casino Project, if built, being shut down peremptorily. I91-03

Most sincerely,

/s/ John C. Dunlap
John C. Dunlap, S.E.
Consulting Engineer

Cc: City of Redding
County of Shasta

Comment Letter I92

From: **melinda brown** <melinbro@aol.com>
Date: Mon, Jun 17, 2019 at 1:22 PM
Subject: [EXTERNAL] DEIS Comments, Redding Rancheria Project
To: <chad.broussard@bia.gov>

DEIS Comments, Redding Rancheria Project
Melinda Brown
3248 Harlan Drive, Redding, CA 96003

- There is no way to guarantee that the serious traffic impacts from this project are adequately mitigated unless the Redding site main access is only from Smith Rd (fewer people to impact versus Bonnyview with thousands of people impacted). Reserve the Bechelli Extension ONLY FOR EMERGENCY USE. Otherwise, once built, the answer to the question of if the connecting streets and intersections to the complex are flowing smoothly with little impact to I-5 and surrounds: the answer will be no -- because there is no way to make this work that is reasonably acceptable. Bonnyview Road is already frequently clogged at the I-5 intersections. The traffic studies show AVERAGE delays not median or the median of the longest delays. The numbers look okay until you are in a car waiting through multiple cycles at a traffic light or idling, emitting exhaust waiting through an extremely long left hand turn lane to clear and for the light to change. I92-01
- The site is a bottleneck -- adequate emergency egress from both access points (Smith Road and Bechelli extension) should plan for moveable dividers turning some lanes into one way lanes during an emergency. I92-02
- The traffic studies were done in 2016 -- already 3 years out of date. Have recent and projected increases in volume been fully incorporated into the calculations? Future growth is being steered and anticipated to the south of Redding so it merges with Anderson -- density at that level with corresponding traffic will further clot the region at the intersections nearest to the proposed complex. I92-03

With no special event or accident, I have seen traffic backed up on the segment of HWY 44 between the River and south I-5 onramp. I have seen traffic backed up onto I-5 at the Hooker Creek Road off ramp. I have been blocked turning left on Cypress to Hilltop for four traffic light cycles. Bonnyview is already an unacceptable traffic snarl at peak times without the addition of Costco or this project. I92-04

Supporting Tribal Sovereignty does not mean lockstep support of a train wreck visited upon the area.

When are enough profits, enough? What other measures can Winriver take to secure its current and future sustainability (in the highly competitive casino one-up-manship environment) without constructing this behemoth at this scale? With a new casino being conceived to the north in Shasta Lake, and new concert facilities opened last week at Rolling Hills, this project may not bring in expected nor adequate revenue despite how big it is.

I'd like to apply some of my prior comments on the scoping document to the Draft EIS.

I think that Native Americans, of which I am one, should hold themselves to the highest environmental, employer and social standards in all their operations I92-05
when they have the wherewithal. A casino has the monetary ability to so. They should be great neighbors, take the highest road despite our nation's historical despicable treatment of almost every tribe -- some of which reaches into the present day.

A new casino should have as close to zero environmental impact as possible.
Short of remaining in agricultural use, to mitigate the impact on the riparian edge, the present minimal riparian edge can be greatly enlarged and enhanced into a true river wildlife corridor along the river and to the river. This casino, because of it's unique placement, can be a flagship of the right way to develop.

This casino could have:
- the cleanest most robust air filtering system and individual smoke ashtray capture devices so that other customers and all employees are not exposed to second hand smoke.
- all water and paper and laundry use should follow best green hotel practices with re-use of gray water and limited use of disposable/one use items.
- all cleansing agents should be low voc and natural.
- all food service should be healthy with minimal waste and utilize compost systems.
- all energy use should be minimized through best available technology and natural daylight with windows that open and solar vents. A solar array can be placed over parking areas to reduce heat gain and provide shade for vehicles.
- time of day operations should be explored that minimize traffic problems. Commute traffic should have precedence over entertainment. Casino could open after 9 to lessen impact on commuters in the intersections and arteries (maybe they already do)
- a bond or agreement could be required to offset future casino traffic impacts if future studies show the need for more traffic infrastructure improvements that are not evident today.
- sewage might be treated onsite patterned after Arcata wetland lagoons if our hot climate can support that or seasonally support it. These systems can be done for less expense. Sunlight and temperature are algae and decomposition issues -- perhaps an artist can design floating lily pad covers to block sunlight to enhance biotic activity.
- landscaping should use native plants and those that provide food for birds and beneficial insects.
- the project could include access for pedestrian fishing, and a river walk for patrons and the public
- the facility could be designed as a shelter and staging center for natural disasters.

This complex should bring added value to our community and to the environment to offset the negative affects gambling has on individual, families, and communities. There should be no unintended, unanticipated negative impacts but only great intended impacts.

I92-05
(Cont.)

SPEAK UP SHASTA ASSOCIATION

June 17, 2019

Via Email (amy.dutschke@bia.gov) and Mail
Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Subject: DEIS Comments, Redding Rancheria Project

Dear Ms. Dutschke:

I write on behalf of Speak Up Shasta Association ("SUSA")—an association of persons who believe that the Strawberry Fields Site and Anderson Site should remain free of the development described in the Redding Rancheria Draft Environmental Impact Statement ("DEIS") dated April 2019, including local residents and others who have recreational and aesthetic interests in seeing the sites remain as they are and that their communities are not harmed by the proposed development. SUSA submits the following comments to the Bureau of Indian Affairs ("BIA") Bureau of Indian Affairs ("BIA") on the DEIS and, furthermore, incorporates by reference the comments on the DEIS submitted by the Paskenta Band of Nomlaki Indians.

Respect for Local Interests and Concerns

I93-01

There is overwhelming opposition to the development from those who live near its planned location: SUSA has received approximately 5,200 petitions in opposition to it.

However, the BIA has provided a period for comment that is so short, given the length of the DEIS and its appendices, that such people, including SUSA and its members, have been denied a meaningful opportunity to review and comment upon the document. SUSA requests that the BIA provide a further opportunity for comment on the DEIS and on a further revised DEIS or supplement to a DEIS that corrects the errors and omissions contained in the current DEIS.

The failure to provide sufficient time for commenting on the DEIS is symptomatic of a larger disrespect for local interests and concerns that pervades the project's plans and the DEIS.

Aesthetics

The DEIS gives short shrift to the aesthetic impact of the planned development. There is not enough information to determine the full extent of the development. This includes such basic things as the height of all of the buildings and the location of the proposed armoring of the streambank. The DEIS also nowhere even acknowledges, let alone analyzes, the effect that replacing open woodland fields with a large casino and retail development would have on the aesthetic enjoyment of Sacramento River users, or the effect on that enjoyment of changing a natural streambank in which bank swallows nest into a lifeless stack of boulders. These impacts are significant, and they should be analyzed. I93-02

Sacramento River Wildlife

The development of the project on the Strawberry Fields Site would have a significant impact on the wildlife of the Sacramento River and this impact is not sufficiently analyzed in the DEIS.

For example, the DEIS acknowledges that the area of the river abutting the Strawberry Fields Site is inhabited by bank swallows and it proposes to armor the streambank in the same area. If the eroding banks are replaced by boulders, there will be nowhere for the swallows to nest. However, this is nowhere analyzed.

The DEIS also acknowledges that the area of the river abutting the Strawberry Fields Site provides designated Critical Habitat for several listed fishes. The DEIS, however, fails to analyze or even provide sufficient information that someone else could analyze the project's impact on these fishes and their habit. Would the fish be disturbed by the noise, vibration, light, and runoff resulting from the development? What about from the construction activities? Would the planned streambank armoring change gravel delivery and would this impact the fishes and their habitat? Would the fishes or their habitat be impacted by the onsite water supply proposal? How about the onsite wastewater disposal? What about a combination of the two? Does that impact change depending on which of the alternatives is combined with one of both of the onsite options? There are very few of these fishes left and much more care must be taken concerning them that does the DEIS. I93-03

Strawberry Fields Wildlife

The DEIS also does not provide sufficient analysis of the project's impacts on wildlife in Strawberry Fields, itself. For example, what would be impact of sourcing water from onsite wells on the site's ponds and wetlands? Would this differ by season? What would be the effect on listed amphibians? The same questions apply to the disposing of wastewater onsite. I93-04

Water Resources

The DEIS proposes to potentially supply this massive development, on both the Strawberry Fields and Anderson Sites, with water pulled from onsite wells but fails to provide sufficient information or analysis concerning this proposal, including where the wells would be located and what effect taking water from onsite would have: on the ecology of the sites; on the ecology of neighboring areas I93-05

(including the Sacramento River); or on other users of the Enterprise Anderson Subbasin. Regarding the latter, in a year and a half, users of that subbasin, including members of SUSA, will be subject to a groundwater management plan. We understand, however, that the amount of water pumped from either the Strawberry Fields Site or the Anderson Site would not be subject to this plan because the Enterprise Anderson Groundwater Sustainability Agency would not have jurisdiction. Nowhere does the DEIS acknowledge this and there is no analysis of what effect the development's use of water from onsite wells could have on the obligations of those who are subject to it. It is a matter of common sense that if one user can use as much water as it likes—without restriction—others may have to make up for this through additional conservation. This should be acknowledged and analyzed, or better yet, any plan to supply water onsite abandoned. Better still, the project as a whole should be reconsidered and abandoned.

I93-05 (Cont.)

More generally, it is impossible to determine from the DEIS what the impact of supplying water onsite would be, in combination with the impacts from other elements of the various alternatives that the DEIS presents, or in combination with the impacts of disposing wastewater onsite. It is clear from the DEIS there are several different scenarios in this regard, but these scenarios are not separately presented or analyzed. They should be.

Traffic

There can be no doubt that this project would have huge traffic impacts on SUSA members and others in the community, and the DEIS contrary conclusion is not credible. Not only is the DEIS's traffic analysis is fundamentally flawed, inaccurate, and inadequate, but it is also uses a level of service ("LOS") methodology that runs contrary to vehicle miles travelled ("VMT") methodology that Californians have recognized is the proper was to evaluate traffic impacts. Has a VMT analysis been done? What were the results?

I93-06

Air Quality

The DEIS fails to provide a sufficient analysis of the project's impact on air quality. Among the problems is the DEIS's failure to acknowledge or analyze the extent to which the traffic mitigation measures proposed in the DEIS will result increased VMT and thus worse air quality. A similar issue affects the DEIS's climate change impact analysis.

I93-07

Noise, Vibration, and Light

The DEIS gives short shrift to noise, vibration, and light impacts. At present, both the Strawberry Fields and Anderson Sites places of quiet and darkness. The project would change all of that, but the DEIS does not contain the basic information necessary to determine the extent of that change or what the impacts of those changes on people and wildlife would be.

I93-08

Flooding

The DEIS does not adequate describe or analyze flooding related issues, including the extent to which certain facilities located on the flood plain would be vulnerable as a result and the extent to which the proposed development would increase flood danger for those in living nearby. I93-09

Cultural Resources and Socioeconomic Conditions

The DEIS's analyses of cultural resources and socioeconomic conditions are inadequate. If the full extent of the archeological resources of these sites are not known, those resources cannot be protected. I93-10

Similarly, unless an accurate analysis of the affected communities' socioeconomic conditions is conducted, it is not possible to determine the true extent that placement of a major casino and retail operation within them would have. I93-11

Public Services

The DEIS uses a classically circular argument to conclude that a development in Strawberry Fields would be provided public services by the City of Redding. It argues that because (a) such a development would be exceptional and (b) the general plan requires that an area be annexed before public services are provided to it, except in exceptional circumstance: the development would be provided public circumstances. Such wordplay does not constitute analysis and whether public services would, in fact, be provided and on what terms is critical for understanding the project's impacts on the community. It should be provided. I93-12

For the foregoing reasons and those described in the comments of the Paskenta Band of Nomlaki Indians, the DEIS is inadequate. Accordingly, the BIA must prepare a revised or supplemental DEIS and circulate the same for review and comment. I93-13

Sincerely,

Randy Carter

Randy Carter
Member of Speak Up Shasta Association

cc: Chad Broussard, BIA Pacific Region, chad.broussard@bia.gov

Broussard, Chad <chad.broussard@bia.gov>

[EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino project

1 message

Maria Escosa <mpescosa@hotmail.com> Mon, Jun 17, 2019 at 10:51 AM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>
Cc: Maria Escosa <mpescosa@hotmail.com>

Dear Mr. Broussard

Attached are my husband Red Emmerson's comments about the proposed Redding Rancheria Casino Project.

Please incorporate these into the public comment record for the Draft EIS. I share his concerns and appreciate your serious consideration of his comments. I94-01

Thank You

Maria Escosa-Emmerson

AAEmmersonReddingRancheriaDEISComments06172019.pdf
664K

A. A. " Red" Emmerson

P.O. Box 496028
Redding, CA 96049-6028
(530) 378-8000

June 17, 2019

VIA EMAIL TO chad.broussard@bia.gov

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

RE: Comments on the Draft Environmental Impact Statement for the Redding Rancheria Fee-to-Trust and Casino Project

Dear Ms. Dutschke:

The purpose of this letter is to provide you with my comments on the Draft Environmental Impact Statement (DEIS) for the Redding Rancheria Fee-to-Trust and Casino Project.

By way of background, my family owns and operates Sierra Pacific Industries, which is a major timber company with lands and operations in California. Our businesses include lumber mills and other manufacturing facilities in Anderson and Shasta County, California. Our companies employ thousands of people in California, and we are a major employer in the region.

Having lived around Redding, California, for over 40 years, I can say what attracted me (and that of many of my employees) to this area is the quality of life offered by this rural community. My wife Maria and I maintain our personal residence on property adjacent to the proposed Redding Rancheria Casino Project. This includes our home and approximately 500 acres of agricultural land which also fronts the Sacramento River.

I94-02

I wish to express my strong personal concern with the proposed fee-to-trust casino project. As a businessman, I am in favor of economic growth and development, particularly when doing so will benefit the local community. In this case, the proposed casino will have substantial negative impacts not only on my property, but also to the community and greater Shasta County without any corresponding benefits. Indeed, the traffic, noise, environmental impacts and other disturbance created by the project will significantly impact the community as a whole and the citizens of Shasta County like myself. This project will not contribute to the local tax base in any distinguishable way and will negatively impact local businesses and the taxpayers of the City of Redding and County of Shasta. Simply put, the project will have very substantial negative impacts on my property and those living nearby without any corresponding benefits.

I94-03

The casino complex will border the Sacramento River which has wonderful anadromous salmon and steelhead fisheries. It's my understanding the facility is expected to accommodate over 1000 people including staff on any particular day. Sewage is to be handled by a leach field that is located within a 100-year flood plain. This poses the risk of putting effluent into the surface water adjoining the banks of the Sacramento River. Many others will comment from a purely technical stand-point but common sense compels me to conclude that a leach field next to a major spawning stream is poor stewardship of a great natural resource.

I94-04

[redacted]

Additionally, traffic in this area cannot reasonably be handled by existing freeway interchanges. I can't understand how the initial studies deemed the current interchange infrastructure adequate. It seems that more expert analysis of this should be done, particularly with the Costco and other retail that will be constructed at the same interchange.

I94-05

In closing, I am strongly opposed to the Redding Rancheria Fee-to-Trust and Casino Project. The area at issue is rural with a substantial portion in the 100-year flood plain and likely incapable of supporting the level of development proposed. The DEIS fails to adequately disclose the impacts the project will have on the community, including loss of property values and impacts to infrastructure, and natural resources and fails to identify mitigation measures that will offset these negative impacts. For these reasons, I request that you deny the fee-to-trust application, and instead work with the Redding Rancheria and the local community to identify alternative locations for this development.

I94-06

Please feel free to contact me at 530-378-8000 if you have any questions about this matter.

Sincerely,

A.A. Emmerson

A.A. "Red" Emmerson

Cc: Ms. Tara Mac Lean Sweeney, Assistant Secretary for Indian Affairs
Mr. Darryl LaCounte, Director, Bureau of Indian Affairs
Ms. Amy Dutschke, Regional Director, Bureau of Indian Affairs

Ms. Julie Winter, City of Redding
Redding City Council Members

Broussard, Chad <chad.broussard@bia.gov>

[EXTERNAL] Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project

1 message

Robert Wharton <rowharton@gmail.com> Mon, Jun 17, 2019 at 4:26 PM
To: chad.broussard@bia.gov

06-17-2019

Dear Environmental Protection Specialist Broussard:

Attached to this brief e-mail is a comment by letter--four pages--to the subject identified in the "Subject" area of this e-mail. This email is meant to be attached to the comment letter.

I95-01

My name is Robert O. "Robbie" Wharton. I reside at 3435, No. 10 Santa Rosa Way, Redding, California, 96003. My telephone number is (530) 921-2724.

Sincerely,

Robert O. Wharton

2nd Lt--BOIA, Re-The Casino Project (06-03-2019).docx
22K

06-16-2019

Chad Broussard, Environmental Project Specialist
Bureau of Indian Affairs, Pacific Regional Office
3800 Cottage Way
Sacramento, CA 95825

Dear Environmental Specialist Broussard:

Re: Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project

I attended the Bureau of Indian Affairs scoping meeting for the Redding Rancheria Fee-to-Trust and Casino Project that was held on December 21, 2016 in Redding, California. After hearing all of the concerns that were stated by the citizens of the community of Shasta County who spoke at the scoping meeting, I wrote a letter to the BOIA in support of the Casino Project going forward by means of the land in issue being taken into trust by the BOIA.

I did not attend the May 20, 2019, BOIA public comment meeting for the draft environmental impact report for the Casino Project. However, I did attend the City of Redding, City Council meeting held on the day that followed the public comment meeting. Thereat, I spoke in favor of the City of Redding working with the Redding Rancheria Tribe both directly and through the sheriff of Shasta County to abate or to mitigate and/or offset any negative impact that the Casino Project could cause if built as proposed.

Additionally, I addressed the "concerns" (bureaucratized English for the word, objections) of the City Council that had been described in various news media reports as well as the objections voice by residents of Shasta County in that media. I again will do so herein below with some expansions.

1. Ascetics: The Casino and Resort campus would be unsightly and would speak negatively of the City of Redding to people who would be driving into Redding from the south.

   Response: Beauty can be in the eye of the beholder; as to the Casino Project, beauty would be in the eye of the beholder; the Tribe is a semi-autonomous city-state nation, and the Tribe would build the Casino and Resort Campus to speak well of the Tribe.

I95-02

2 The loss of "Churn Creek Bottom": Another part of the beautiful agrarian area known as Churn Creek Bottom (the extreme north end of which is barely within the city limits of the City of of Redding) would be destroyed with that destruction not only adversely affecting the positive effect of Churn Creek Bottom on all of central Shasta County but also the fish and wildlife of Churn Creek bottom.

Response: In the mid to late 1960's, the 232 acres in issue and all of the rest of the western edge of Churn Creek Bottom was irreversibly separated from Churn Creek Bottom by the construction of Interstate 5: That significant western edge, which was nevertheless a minority portion (albeit by a small percentage), of Churn Creek Bottom ceased then to be part of Churn Creek Bottom. There are now RV parks at near its southern end, and to the north of those RV parks are general trailer parks.

Since the severance of the western edge of Churn Creek Bottom by the construction of I-5, the 232 acres in issue has been a low-quality habitat for wild life. Lands to the south of that 232 acres have remained high quality habitat in no small part for wildlife. Nevertheless, I cannot believe that there has ever been statistically significant wildlife migration to or from that severed western edge and to or from Churn Creek Bottom. There can be no significant effect on fish possible from the project.

I95-02
(Cont.)

3 The potential sporting goods store of the Project could pose a threat of one of the sporting goods stores in the City of Redding going out of business:

Response: This "concern" is so far from the responsibility of the City Council that the Council should dismiss it without further consideration.

4 The event facilities at the proposed Project could threaten the self-sustainability of the Redding Civic Auditorium; thus, the City Council would have to supplement the revenues of the Civic Auditorium with taxpayer dollars:

Response: For approximately each of the 10 years that immediately preceded the City of Redding leasing the Civic Auditorium to the School of Super Natural Ministry of Bethel Church, the City of Redding used taxpayer dollars to supplement the insufficient-for-self-sufficiency revenues of the Civil Auditorium. Those annual contributions ranged from approximately $750,000 to $1,000,000.

There is more than enough event and convention business from people and/or entities that do not want an event or convention at the campus of a casino and resort to make and keep the Civic Auditorium self-sufficient—with proper management.

5. The traffic congestion on both sides of the South Bonneyview I-5 overpass will require significant mitigation:

Response: That mitigation is already required and pending the completion of a building-in-progress shopping center (anchored by a Save Mart) at the northeast corner of the South Bonneyview Road overpass and (hopefully) pending the approval of the almost-certain-to-be-built mega Costco at the northwest corner of the South Bonneyview Road.

Paradoxically, the most effective and least costly traffic mitigation for the non-casino-caused traffic congestion that will be problematic within one year on both the westside and the eastside of the South Bonneyview Road overpass would be an extending and a widening of the road that would give access to the Casino Project (from the southwest side of the South Bonneyview overpass) and to the ramp-less Smith Road I-5 overpass to the south if not also a continuation of that casino-access road to a meeting of Knighton Road.

6. The Casino Project will increase crime in the community:

Response: The creation of a casino in a community without a casino or casinos will increase crime in the community from which the casino draws local gamblers. This is true no matter how fine the management of the casino.

I95-02
(Cont.)

The percentage of increase varies form study to study; however, the most respected study that I could fine is an older—put patently not outdate—one that puts the percentage of crime increase at 8%.

That increase has already occurred from the creation and with the existence of the current Win-River Resort and Casino. The element of the community of central Shasta County that is both criminally bent and gambling prone will not increase with a grander casino of the Project.

The Redding Rancheria Tribe has shown that it will put forth money to mitigate any increase in crime form the existence of the Tribe's casino. The availability of adequate money to do so was both too limited and then was decreased by the State of California's "take" and "take more" of the revenue of the Tribe's revenue from the current casino.

With the dramatically increased income to the Tribe that the Project will provide if build as is proposed by the Tribe, the Tribe will have the ability to accomplish the mitigation of already existent increased crime and more—much more. The Tribe is currently involved with low-cost healthcare for not only Indians but also everyone else.

This for low-profit to medium-profit area of endeavor may be expanded with the additional revenue from the Project. Furthermore, the Tribe is certain to create a public benefit foundation by whatever name known for funding this community betterment project and that community betterment project and so on and so forth as the Tribe finds true promise of betterment to the "Community of Shasta County"—to which the Redding Rancheria Tribe belongs--within requests for the granting of funds.

In closing, I will give my background. I anticipate that it will assist you in your evaluation of this comment about the Redding Rancheria Fee-to-Trust and Casino Project.

I am not an American Indian. My ancestry is English and Irish. I am not in the employ of the Redding Rancheria Tribe. I have never been in the employ of the Tribe. (I might have done a short-work consultation for the Tribe as an independent-contracting private investigator twenty-five years ago, or I may have consulted for free with one the several former Shasta County peace officers whom I knew when he [of they] worked in the security department of the casino and/or the compliance department of the Tribe. I cannot say with certainty as I do not have ready access to those now-ancient records.)

I am not pro-gambling. My visits to the current casino have been to attend event functions—charity fund raisers and preforming artists' presentations—as well as to take this friend and that friend to and/or from the casino when each of them has been without a car.

Through all of the 1970's and the first third of the 1980's, I was a Shasta County deputy sheriff. Since then, I have been a forensic private investigator; however, I no longer use my P.I. license for income. I use it primarily to inquire and write about operations of local governments.

Sincerely,

Robert O. Wharton

I95-02
(Cont.)

WRITTEN COMMENT CARD

BUREAU OF INDIAN AFFAIRS – PUBLIC HEARING MEETING
REDDING RANCHERIA FEE-TO-TRUST AND CASINO PROJECT

REDDING MEMORIAL VETERANS HALL – REDDING, CALIFORNIA
MAY 20, 2019

BUREAU OF INDIAN AFFAIRS
19 JUN 14 AM 10:25

Rec'd Via: Ltr
Dup RFI From:
Dup RFI #:
Route: Chad B
Response Required:
Due Date:

IF YOU WOULD LIKE TO SUBMIT A WRITTEN STATEMENT, PLEASE COMPLETE THE FOLLOWING INFORMATION AND COMMENT IN THE SPACE PROVIDED BELOW. GIVE TO ATTENDANT OR DROP IN THE WRITTEN COMMENT BOX. COMMENTS MAY ALSO BE SUBMITTED BY MAIL OR EMAIL TO THE CONTACT INFORMATION PROVIDED BELOW.
WRITTEN COMMENTS ON THE DRAFT EIS MUST ARRIVE BY JUNE 17, 2019.
(Please print legibly)

Name: Margaret Wood Organization: Private citizen

Address: 3113 Colemband Walk Redding, Ca 96001

Comment: I am writing to voice my objection to the casino project. The proposed development would irrevocably alter the lush riparian entrance to Redding. Increased traffic, noise and light pollution would negatively impact wildlife. Thank you for considering this input

I96-01

Please give to attendant, drop in Written Comment Box, mail to Bureau of Indian Affairs, Attention: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way Room W-2820, Sacramento, CA 95825, or email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. If emailing comments, please use "Draft EIS Comments, Redding Rancheria Fee-to-Trust and Casino Project" as the subject of your email.

Comment Letter I97

From: **David Harvey** <hp35guy@icloud.com>
Date: Sun, Jun 16, 2019 at 3:09 PM
Subject: [EXTERNAL] Proposed Win River Casino Project
To: <chad.broussard@bia.gov>

My wife and I moved into our present home in 1977 off Churn Creek and Demoll Drive less than 2 miles from the Win River Owned hotel on Churn Creek and Bonneyview. The proposed casino would be close by and compound the prospective traffic increase connected with the new shopping complex being constructed nearby. And the specter of a Rolling Hills type casino being the first landmark one sees on I5 for both northbound and southbound traffic may be all right with the citizens of Corning but shouldn't be what travelers will associate with Redding while driving through our city. They should expand their current operation off 273 rather than build a second casino thereby changing the character of our city. I raised 3 children here before the first casino was built and I doubt I would have moved to Redding from San Jose in 1977 for the aforementioned reasons. Sincerely, David Harvey

I97-01

Sent from my iPad

From: **Al Shufelberger** <al.s@rlttrucking.com>
Date: Mon, Jun 17, 2019 at 5:04 PM
Subject: [EXTERNAL] FW: Message from KMBT_423
To: chad.broussard@bia.gov <chad.broussard@bia.gov>

From: RLT Scan
Sent: Monday, June 17, 2019 5:01 PM
To: Al Shufelberger <al.s@rlttrucking.com>
Subject: Message from KMBT_423

Redding City Council

777 Cypress Ave.

Redding, CA 96001

Re: Rancheria casino, Costsco relocation

Dear City Council,

The proposal for the expansion of the Bonnyview and Bechelli area to include the Rancheria casino and Costco relocation would do untold harm to a trucking business that has called Redding home for 47 years. Roundabouts simply do not work for the large vehicles that trucking companies utilize. We would need to find a new home elsewhere if the proposed plan does indeed go through to fruition. That would mean a company that employs more than a 100 people each year for multiple decades would have to relocate. I started this company here in my hometown because I thought Redding would welcome business, would welcome an employer loyal to its employees, its customers and its home.

Our business would not be the only one negatively impacted either, but so would Cook Concrete Products, Guglielmetti Trucking and Weaver Lumber, all of which call this area home while providing hundreds of good-paying jobs that would soon vanish.

I98-01

Please, I urge you to see the folly of these projects and the shortsightedness of rubberstamping them. Protect this area. Protect these businesses. Protect these people. Say no to these ill-advised proposals.

The traffic situation works in the current environment but would simply be impossible for us to continue operating in any meaningful way if these undue changes are accepted.

Thank you,

Al Shufelberger

RLT Inc.

SIERRA CLUB
FOUNDED 1892

Shasta Group
Mother Lode Chapter
P.O. Box 491554
Redding, CA 96049-1554
www.motherlode.sierraclub.org/shasta

June 17, 2019

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

Subject: Comments on DEIS for the Proposed Redding Rancheria Fee-to-Trust and Casino Project, Shasta County, California

The Shasta Group of the Sierra Club consists of approximately 1,100 active members located in the geographical area from Red Bluff to Oregon within northeastern California. Most of these members reside in the populated areas of Shasta County and will be directly impacted by all the Redding Rancheria Project alternatives. The Sierra Club is a non-profit organization of people committed to protect the natural environment and preserve natural areas from development and from impact caused by human populations. Our Shasta Group of the Sierra Club offers the following comments on the subject document which considered the following alternatives: (1) Proposed Project at Strawberry Fields site; (2) Proposed Project with No Retail Alternative; (3) Reduce Intensity Alternative; (4) Non-Gaming Alternative; (5) Anderson Site Alternative; (6) Expansion of Existing Casino Alternative, and (7) No Action Alternative. I99-01

1. This project and all of the alternatives will significantly and permanently alter our largest cities in Shasta County and the unincorporated areas near the proposed alternative sites. The existing Win River Casino is partially hidden by trees, Clear Creek and is recessed from Highway 273. This location has been acceptable to the surrounding cities and county areas. This is the type of facility the people in our area accept as an area for drinking and gambling. This allows the local non-tribal people the opportunity to plan where developments occur and how fast the legal boundaries of the areas change. This local control will be lost if the Project is allowed outside the existing area. I99-02
2. The DEIS does not adequately describe impacts to our local economy, infrastructure and environment. These areas of the DEIS are particularly weak and need further data to address inadequacies which are pertinent to each alternative. I99-03
3. The number, sizes and types of trees that will be removed from each of the proposed sites is not documented in the DEIS. The large oak trees are a part of our visual heritage in Shasta County and add tremendously to the inviting landscape. These trees provide habitat for many animals, remove CO2 from the air and break up ameliorate the visual impacts of man-made structures. A map should be provided with data on all trees that will be removed and how the Project will mitigate for the loss including specifics I99-04

about the number, size and type of tree species that will be planted and their maintenance. We believe newly replanted trees must be at least 15 feet in height when planted and will achieve a mature height of 30-40 feet.

I99-04 (Cont.)

4. The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. It is not clear what portion of these trips are for employees, casino patrons, restaurant patrons, retail customers, outdoor entertainment events, hotel guests and people wanting to see the facilities. The traffic analysis completely ignores impacts to typical weekday rush hour traffic which currently already involve congestion. We believe this is an incorrect portrayal of how the substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS. The traffic analysis must also compare the data from the Costco River Marketplace Project to the proposed Project to see if the data is consistent between the two projects and to incorporate the effect of this additional significant impact. The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. It is not clear what portion of these trips are for employees, casino patrons, restaurant patrons, retail customers, outdoor entertainment events, hotel guests and people wanting to see the facilities. The traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS. The traffic analysis must compare the data from the Costco River Marketplace Project to see if the data is consistent between the two projects.

I99-05

5. The frontage roadway required for the Strawberry Fields site is not feasible. The area near residences and retail buildings on Bechelli Lane cannot be sufficiently widened. The traffic circle proposed for the Costco project will not be able to handle traffic from that shopping center and the other facilities east of I-5. This project site is completely inappropriate for this type of development and should be left for agricultural uses with no commercial access.

I99-06

6. This project calls for new businesses such as sporting goods and retail beyond the casino that will directly compete with and hurt local Redding businesses. The motels in Redding will be significantly negatively impacted with lower booking rates. Food and retail will also be negatively impacted in Redding and Anderson. The DEIS review of economic impacts is highly flawed and inadequate, and this project should not proceed further without a genuine accurate assessment of impacts to the local economy beyond short term construction jobs.

I99-07

7. The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City of Redding's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. We oppose transforming the Strawberry Fields site from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the entire I-5 corridor from Cottonwood to City of Shasta Lake. It will be the tallest structure north of Sacramento! Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

I99-08

8. The Sacramento River adjacent to Strawberry Fields is essential to the survival of salmon and steelhead and is listed as critical habitat vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues and additional inadvertent pollution caused by both trash accumulation and the additional traffic which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the River are poorly described in the DEIS and do not convincingly describe in detail how the River and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species. I99-09

9. This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud and highly lighted, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to adequately address the amphitheater proposal. The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund." This is another compelling reason why the Strawberry Field site should be abandoned. I99-10

10. Light is a pollutant produced by the project at all sites analyzed including expansion of the existing site. Light will have negative effects on all the ecosystems nearby, residents on all sides and considerable distances beyond. It will make driving on Interstate 5 more dangerous. Light impacts cannot be mitigated to acceptable levels and therefore all sites along I-5 that do not currently have high light impacts should be abandoned. I99-11

11. We are opposed to the project development on the Strawberry Fields site and the Anderson site. The DEIS is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. A good alternative site is available southeast of Anderson which was a former wood products site with good I-5 access. Another good site is on Clear Creek where years of gravel extraction has left the area unusable for future residential development. These two sites would be excellent for the project. Photos of their locations are given below. I99-12


Anderson Wood Products Site
Legend
Google Earth
N


Clear Creek Site
Legend
Google Earth

12. Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

I99-13

We urge the Bureau of Indian Affairs to deny the project as configured and at a minimum move it to a site that will not disintegrate the land ecosystem and contribute to sprawl of incompatible uses.

Respectfully submitted,



John Livingston
Chair of the Executive Committee of the Shasta Group of the Sierra Club

Comment Letter I100

From: **LInda PERKINSPerkin** <perkins3744@gmail.com>
Date: Mon, Jun 17, 2019 at 7:15 PM
Subject: [EXTERNAL] Draft EIS comments, Redding Rancheria Fee -to -trust and casino project
To: <chad.broussard@bia.gov>

WE are very concerned about the traffic impact. We live near Loma Vista and watch many children crossing Churn Creek or Bechelli Ave. I don't feel Bonnyview can handle any more traffic. I100-01

We are concerned about the impact on the River we love . I thought a promise was made **not** to build a casino when the land was acquired by the Rancheria. The kind of impact, as I imagine, by your plans is very irresponsible. Don't let greed overtake reason. I100-02

Linda Perkins
3744 El Portal DR.
Redding, CA 96002
5302232377
perkins3744@gmail.com

KIXE

Rec'd Dir abl ✓
Dep RD Trust ✓
Dep RD IA
Route
Resp
Due Date
Memo
Fax

June 14, 2019

To: Amy Dutschke, Regional Director, BIA, Pacific Region,
2800 Cottage Way, Sacramento, CA 95825

From: Dave Cox, General Manager/CEO, KIXE TV (PBS)
603 N. Market Street, Redding, CA 96003

Re: Draft EIS Comments, Redding Rancheria Fee-to-trust and Casino Project.

Director Dutschke,

With the unanimous support of our Board of Directors and staff, it is my great honor to provide this letter of support for the Redding Rancheria in their efforts to re-locate their gaming facility in the City of Redding.

For years I have watched the Redding Rancheria establish themselves as an invaluable community partner. They care deeply about the communities they serve, and are true stewards of the land. I have talked personally with people who remember firsthand the poor conditions that existed at the casino's current location before it was built, and how the casino positively addressed those issues and brought prosperity to the area.

I101-01

NORTHERN CALIFORNIA EDUCATIONAL TELEVISION ASSOCIATION
603 N. Market St. Redding, CA 96003 | (530) 243-5493 | Fax (530) 243-7443 | www.kixe.org

KIXE

The Redding Rancheria also provides tremendous generous support to countless non-profits and other organizations, including KIXE TV here in Redding. The Redding Rancheria has provided KIXE, Redding's local PBS station since 1964, over $50,000.00 in business and support since 2012, and they support many of our local non-profits in this manner.

And I also want to point out that the Redding Rancheria isn't just about gaming or exclusively the City of Redding. I have lived in Weaverville for 34 years, and the establishment of the Rancheria's Community Health Clinic in Weaverville has been a welcome, and much needed addition to our small rural town.

I101-01
(Cont.)

From a business perspective I see nothing but good resulting from approving the Rancheria's request to re-locate. The new location will provide greater exposure, resulting in increased revenue, which will then be pumped back into the local economy in many ways, including the continued generous philanthropic acts of the Redding Rancheria.

Sincerely,

D Cox

Dave Cox
General Manager/CEO
KIXE TV
Redding, CA

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Environmental Protection Agency
Strawberry Fields Casino Project

Regarding Indian Casino Environmental report:

I have lived at 4860 Balls Ferry Rd Anderson, CA for almost 40 years on 10 acres, with a large family and many animals.

Several years ago we fought the Gravel Pit that was proposed across Balls Ferry and lost.

Results:

1. Livestock

Once work started on the river gravel pits the wild life was completely disrupted. Coyotes have been a problem the last 10 years or longer. One season I lost 9 lambs and a mother up close to the house in one night. A few years back a cougar was spotted in my pasture by a neighbor using Duck Lane. He rode his horse down Duck Lane with his gun for quite awhile. I102-01

I had a large pasture I could see from the kitchen window that had free roaming ducks, geese, turkeys, guinea hens, and chickens with a pond. The raccoons and possums that quickly moved into the neighborhood from the river wiped all of them out.

My four children that are still home are in wheelchairs and coyotes come right up to the backyard. We can't keep cats, they disappear as fast as we get them. We lost 8 last year and we need them in the out-buildings due to giant rats outside. Coyotes again.

2. Wells:

When we run into dry winters, our well can get pretty low. In summer when they build a casino- How big and deep will it's' wells be? How will that affect the neighboring home-owner wells in dry years? It's our only source of water for our home and property. I102-02

3. Increased Traffic around Balls Ferry

Traffic especially on Kimberly which I drive a lot can be scary. Especially the blind curves of Kimberly and Balls Ferry from our home. You can't see the big trucks rolling up until you're turning. I102-03

This last winter there were so many pot-holes, it was impossible to drive Kimberly due to the weight of the truck and rain.

We moved here from Camarillo California where my husband and I grew up. His family farmed and owned the pioneer's transfer of mules that hauled in the bricks to build the town of Oxnard.

The area was becoming so crowded, farmland disappearing under cement until we sold out and brought our first seven children to Anderson, where they could have a little room, animals, and be able to hunt and fish. As our six birth and our adopted children grew up this house gave a great life and room to roam, a place to care for animals and garden to 40 foster I102-04

children and 7 more adopted children. Four of the oldest are in some sort of farming. Luckily our three sons were smart enough to get out of California and farm in Oregon. I102-04 (Cont.)

There is no prettier piece of property to greet travelers in and out of Redding than that beautiful open space where cattle graze and you often spot deer, wild turkey and other wild animals including coyotes. I102-05

There is already a casino in Redding also there is a Costco, there is also an empty Shopko and other large buildings vacant in Redding. Please don't cover more of our beautiful land in cement. Look at the buildings standing empty. Don't hurt the people living and farming between Anderson and Redding. Please leave the land open. I102-06

4. The traffic on I-5 gets worse every year along with accidents. I try to drive any road except I-5. When on I-5, I get off as soon as I can at Bonnyview and take city streets where I shop for new business frequently that I wouldn't have stopped at if I stayed on I-5. That won't be an option if a casino and Costco go in. I'll take 273 and avoid all those businesses.

Another lane and overpass won't help for long. When we visit Camarillo there are many times a day and weekends when it can take an hour to go from Camarillo to Ventura. You need to pass that way to go up 101. You also pass Redding on the I-5 Corridor on the way north to Oregon and Washington or south to Southern California. The traffic will get worse if you build along I-5. I102-07

I did attend about 1 ½ hours of the meeting at the Veterans Hall about the Environmental impact of the casino. I am thankful for what the present casino and their people have done for the community. I heard them talking about tearing down housing the Indians have lived in across from the casino with such a big piece of land and only a small acreage used for the casino, in a few years, will they then want to fill the rest of the land with housing?

They have done a lot at the present Casino but it also encouraged a lot of homeless to that area for hand-outs. You're right I don't want more buildings on I-5 and Deschutes or from Anderson to Cottonwood. Certainly not a Casino or shopping center. They can't keep the factory outlets buildings full. I102-08

Thank You

Karen Bitter
(530) 365-8470

Copy to:
Leo Bough - Supervisor Shasta Co
Churn Creek Home Owners

Royal M. Mannion
6901 Granada Drive
Redding, CA 96002

June 15, 2019

DEIS Comments, Redding Rancheria Fee-to-Trust and Casino Project

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

Ms. Dutschke,

As a Shasta County resident for 38 years, I am submitting the following comments in response to the BIA's Draft Environmental Impact Statement for Redding Rancheria's proposal to construct and operate a casino/resort in Shasta County. I103-01

TRANSPORTATION

I don't believe that the transportation portions of the DEIS adequately consider the impact of traffic in the vicinity of South Bonneyview and I-5 with the combined development of the Casino, Costco shopping center and Save Mart shopping center. This area definitely has the potential of having the worst traffic congestion in Shasta County.

The proposed improvement to Bechelli from two to four lanes will take away part of the Hilton Hotel parking. It's not adequate now during busy times. A proposed parking lot down the hill from the hotel may be feasible but not very practical.

The transportation analysis does not include Sunnyhill Drive which provides access to private residences. At the intersection of Bechelli and Sunnyhill, traffic flow will go from a few vehicles/day to thousands/day if that route becomes the primary access to the casino/resort.

I do not believe that the casino/resort as proposed in Alternatives A, B, C, and D with only Site Access 1 can be safely operated. I103-02

Sincerely,

Royal M. Mannion

Royal M. Mannion

ECONOMICS

The DEIS does not cover the financial effect on nearby property values. Will the Casino/Resort cause those property values to decrease, increase or have no effect at all? It is not addressed.

Neither does the DEIS address the effects that the proposed development would have on existing businesses or enterprises such as other hotels, restaurants, or the City of Redding Civic Auditorium. I103-03

The loss of property taxes and the Hotel Occupancy Tax also concerns me.

NOISE

The noise analysis does not adequately consider the effects of the proposed outdoor amphitheater on its neighbors to the north on Sunnyhill Drive. How miserable it would be for a neighbor trying to sleep while a late night concert blares away from the Resort. I103-04

LAND TRUST

What is the criteria for determining the granting of a Trust? I couldn't find anything specific related to this matter in the DEIS. Is it purely an arbitrary decision? I103-05

LAW ENFORCEMENT

The DEIS indicates that the Shasta County Sheriff would be the agency dealing with law enforcement. Undoubtedly, there will be many incidents associated with the Casino/Resort that would involve crime or transportation in the adjacent land within the Redding Police Department jurisdiction. I103-06

In conclusion, after reviewing the DEIS, it is my opinion that the alternative to make improvements at the current location should be selected. Any of the other alternatives proposing a new location would be wrong for our community.

Sincerely,

Royal M. Mannion

Royal M. Mannion

In The Matter Of:

BIA PUBLIC DEIS HEARING FOR THE REDDING RANCHERIA PROPOSED FEE TO TRUST AND CASINO PROJECT

May 20, 2019



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Min-U-Script® with Word Index

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BIA PUBLIC DEIS HEARING FOR THE

REDDING RANCHERIA

PROPOSED FEE TO TRUST AND CASINO PROJECT

---O0O-

May 20, 2019

6:03 p.m.

REDDING, California

JULIE A. KELSTROM, C.S.R. License No. 10547

HEARING OFFICERS

CHAD BROUSSARD: Environmental Protection Specialist
RYAN SAWYER: Analytical Environmental Services

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Redding, California

May 20, 2019

MR. BROUSSARD: We're going to go ahead and start the hearing.

So the Bureau of Indian Affairs welcomes you to this public hearing for thE proposed Redding Rancheria Fee to Trust and Casino Project EnvironmentaL Impact Statement, or EIS.

My name is Chad Broussard and I am an Environmental Protection Specialist for the Pacific Region of Bureau of Indian Affairs, or BIA for short. The BIA is a bureau within the United States Department of Interior. I will be your facilitator at this evening's public hearing. At the table with me is Ryan Sawyer with Analytical Environmental Services, the BIA's EIS consultant.

I want to point out the restrooms are at the entrance, one on either side, and there's also a handicapped accessible restroom back here. The emergency exits are at the entrance and then there's one on either side of the hall and then there's one down that hallway. All of the exits on this side are alarmed and so please only use them in an emergency.

So we're here tonight to accept comments on the draft Environmental Impact Statement, or EIS, for the

proposed fee to trust land acquisition in unincorporated Shasta County just south of the City of Redding and the subsequent proposed development of a casino for the federally recognized Redding Rancheria. The location of that fee to trust property can be seen on the information boards which are in the back in that corner.

If the BIA approves the proposed acquisition, it will hold the property in trust for the tribe allowing development of a gaming facility on the site. However, the National Environmental Policy Act, also known as NEPA, requires that the BIA conduct an environmental review before deciding whether or not to accept the land into trust. A draft EIS has been prepared and that is the first step in the environmental review. We published the draft EIS on April 10th, 2019.

The purpose of tonight's hearing is to facilitate public review and to facilitate public comments on the draft EIS. We will consider all comments received during the public comment period, which ends on June 17th, 2019, and then we will publish a final EIS which will include responses to all substantive comments. Note that the comment period originally prescribed by the April notice of availability has been extended by two weeks and the new end of the comment period is June 17th, 2019.

Both spoken and written comments will be accepted

at tonight's hearing. If you have a written letter that you'd like to submit, please hand it to a representative at one of the tables in the back near the entrance. We also have cards available for you to make written comments at the tables also near the entrance. Just grab a card, write out your comment and either hand it to one of the representatives or mail it to the BIA at the address on the card prior to the deadline which is again June 17th, 2019.

If you would like to make a spoken comment at the hearing tonight, please fill in one of the speaker cards available on the back tables and hand them in to one of the representatives at that table. Please write as legibly as possible so I can understand your name. I'm likely to butcher your name anyways, but if it's legible it's less likely, so I appreciate that.

We will take speakers in the order that I receive the speaker cards. These are the speaker cards here, these yellow cards. Everyone will be given three minutes to make their remarks to ensure that everyone has an opportunity to speak. After all the speakers have given comments, I may provide individuals with an additional three minutes if there's time.

With that said, a public hearing is not the best forum for lengthy comments due to the constraints of time.

If you have a lengthy comment, we encourage you to submit a written letter. All comments will receive equal weight, whether they're spoken or written.

We have a stenographer here that will record your comments word for word so they can be considered fully for the record. With that said, please restate your name for the record before you give your comment and please speak as clearly as possible so that the stenographer can understand and accurately document your words.

Please understand that the purpose of tonight's hearing is not to have a question and answer session or debate of any kind. We will not respond to questions or engage in debate. We are here to listen and document your comments. We will then carefully consider your spoken and written comments and respond to all substantive comments in the final EIS which will be made available to the public for review.

Now, we've asked our EIS consultant to provide you with a brief presentation on the proposed action, the purpose in need, the alternatives analyzed in the draft EIS and the EIS process. But, first, I'd like to ask everyone please turn your cell phones off or to silent. And I mentioned a few minutes ago, but I want to mention it one more time in case you didn't hear, the parking lot directly across the street is a private parking lot and if

you're parked there, you may be cited or towed. So if you have parked there, please move your car.

MS. SAWYER: Good evening. I'm Ryan Sawyer with Analytical Environmental Services or AES. I'll be giving a brief presentation on the NEPA process, the proposed project and alternatives.

As Chad mentioned, the purpose of the hearing tonight is to obtain public comments and feedback on the draft EIS prepared for the Redding Rancheria fee to trust and casino project. Public feedback and input is an integral part of the NEPA environmental review process which I will explain in detail later in this presentation, but first some background on the proposed project.

The Redding Rancheria has submitted an application to the BIA requesting that the Department of Interior take the approximately 232 acre strawberry field site into federal trust. The tribe subsequently proposes to develop approximately 37 acres of the site with a casino, hotel event conference center, dining and retail facilities and associated infrastructure. The existing Win River Casino on the tribe's reservation will be repurposed for tribal government or service uses.

The federal purpose in need for the proposed action is to facilitate tribal self-sufficiency self-determination and economic development, satisfying

both the BIA's land acquisition policy and the principle goal of the Indian Gaming Regulatory Act. The tribe's purpose and need associated with the project is to restore the land base of the tribe, locate additional tribal services and housing on the current Rancheria and strengthen the socioeconomic status of the tribe and ensure that the strawberry field site, which is traditional territory of the tribe, is adequately maintained and protected for future generations.

The regional location of the strawberry field site is shown on this slide, along with the location of two alternative sites that were considered in the EIS. The proposed trust property is located in unincorporated Shasta County just south of the city limits.

The site is currently used for seasonal cattle grazing and is bounded by private properties to the north and south, the Sacramento River to the west and I-5 to the east. It's zoned by the City's limited agriculture with a small portion zoned as a designated floodway. However, there's no development proposed for the designated floodway.

Here we can see an aerial photograph for the proposed trust property and the surrounding uses. The areas outlined in red are locations for potential off site access improvements.

NEPA requires federal agencies to take into account the environment impact of federal actions of projects prior to implementation. Environmental Impact Statements are required for major federal actions significantly impacting the quality of the environment. In this case a proposed major federal action requested by the tribe is the trust acquisition of the Deed of Trust property.

This slide illustrates the key milestones of the NEPA environmental review process. Scoping is the first step in the process and is considered the information gathering stage where input is obtained from the public and the agencies related to the project. The draft EIS is then prepared based on the information obtained during the scoping process and is released for public review and comment.

Comments obtained during this review period are considered and responded to within a final EIS which is also released during a 30-day waiting period prior to the agency's decision on the project which is summarized in a record of decision or ROD.

The scoping process for the draft EIS commenced three years ago with a Notice of Intent released in November of 2016. A scoping report summarizing the comments received during that period was published in May

2017. The draft EIS was recently released on April 10th with the comment period closing on June 17th.

The key components of the EIS were organized into the five chapters shown on this slide. This includes Section 1, which provides an introduction and overview of the purpose of the need associated with the federal action; Section 2, which provides a description of the proposed action alternatives; Section 3, which gives an overview of the affected environment and Section 4, which goes into the environmental consequences of the project alternatives and Section 5, which summarizes the recommended mitigation to avoid adverse environmental consequences.

Several alternatives were evaluated in the EIS. I'll explain them in the following slides here.

Alternative A, the proposed project, would develop the site of the casino resort, including a 250-room hotel, event center, retail facilities and associated infrastructure. Alternative A would employ approximately 650 new full-time equivalent employees.

Water supply and waste water treatment for the project will be provided through either connection to the City of Redding's existing infrastructure or to the development of onsite ground water wells and onsite waste water treatment water plan.

The land of the proposed facility within the site is shown here. A larger rendition of this is provided in the large exhibits at the back of the room.

This slide provides an architectural rendering of the proposed facilities under Alternative A as viewed from I-5 approximately.

And this slide provides the before and after view of facilities from much further on the site near Smith Road. It's kind of hard to see, but there's a better representation of this within the EIS.

Alternative B includes essentially the same elements as Alternative A, except it does not include the 130,000 square foot retail facility and has approximately 331 fewer full-time employees. As shown, the site plan for Alternative B is nearly identical to A with the exception that the retail is not there.

Alternative C is essentially the same as Alternative A, with the exception that the casino would be approximately 20 percent smaller with approximately 92 fewer employees. And here is the site plan.

Alternative D would development the project site with a slightly smaller hotel, 120,000 square feet of retail, dining facilities, parking and supporting facilities. There would be no gaming facilities under -- oops, I'm going the wrong direction. Sorry, guys. Okay.

Here's the site plan for Alternative D.

Alternative E would involve the trust acquisition development of a different site located in the City of Anderson. The Anderson site consists of 55 undeveloped acres adjacent to I-5. This alternative would develop the same land use as Alternative A with a slightly smaller retail facility. Water supply would be provided through connection to the City's existing infrastructure, the City of Anderson's infrastructure, that is, or onsite ground water wells. And waste water would be provided through connection to the City's infrastructure. Here is the site plan for Alternative E.

Alternative F involves the expansion of the tribe's existing casino with a larger gaming floor, a 10,000 square foot event center and parking garage. This alternative would result in an additional 45 new employment positions. Here is the site plan for Alternative F.

The draft EIS provides a description of both the affected environment and the environmental consequences associated with the issue areas shown on this slide. The draft EIS identifies a number of best management practices and mitigation measures to avoid or reduce the potential for adverse environmental consequences resulting from the project alternatives.

The measures identified for Alternative A are just briefly listed on the following slides. To prevent impacts from soil erosion, the tribe would comply with the National Pollutant Discharge Elimination System general construction permit requirements, including the preparation of a storm water pollution prevention plan which would require that the BMPs are implemented during construction, such as the use of hay waddles and covering stockpiles to prevent silatation and contamination of run-off.

To prevent additional effects to water resources, the tribe will implement water conservation measures, adjust landscape irrigation for weather conditions and limit fertilizer use. Air quality effects will be reduced with the implementation of fugitive dust prevention measures during construction and other measures to reduce air pollutant and greenhouse gas emissions, such as limiting equipment and vehicle idling time, encouraging employee and patron ride share programs and using energy efficient lighting, air and heating systems.

While the majority of the site will not be developed and would continue to function as habitat to certain wildlife species that occur in the area, mitigation in the EIS includes conducting pre-construction surveys and avoidance measures for protected species,

along with fencing and avoiding wetlands and waters of the U.S. during construction and consultation with U.S. EPA and Army Corps of Engineers prior to streambank stabilization.

For cultural resources the EIS identifies procedures in the event of discovery of cultural resources during ground disturbing activities and related to socioeconomics. While most economic and fiscal impacts are determined to be positive, the tribe will implement policies to help problem gamblers in accordance with state compact requirements.

Related to noise. It was recommended that construction hours will be limited, the equipment include the best available noise control technology and that sound of outdoor events at the amphitheater be monitored. The traffic engineering study prepared in support of the draft EIS identified a number of impacts associated with level of service delays at various intersections and roadways as a result of the increase in vehicle traffic associated with the project, and recommended mitigation included making fair share payments to improve impacted intersections of roadway segments and also prepared a traffic management plan during construction activities.

While no known hazardous material contamination exists with the site, best management practices to address

hazardous materials handling and potential issues during construction were recommended. Recommended measures and best management practices for public services included entering into agreements with the city and/or county and making annual payments for increased public service costs, implementing security measures at the site and implementing measures during construction to minimize the risk of fire or damage to existing utilities.

The draft EIS is available for review at the BIA's pacific regional office, the redding public library and www.reddingeis.com. As I mentioned, all comments are due to the BIA by June 17, which is four weeks from today exactly. After the public review commentary period of the draft EIS is closed, the BIA will prepare a final EIS which will include the comments received on the draft, responses to those comments and revisions or clarifications for the draft EIS analysis.

The final EIS will be made available to the public for review in a similar manner as the draft EIS with its availability announced through the circulation of notice in the local paper and the federal register. At least 30 days after publication of the final EIS, the BIA may issue a record decision that includes a decision on whether or not to approve the proposed action and the ROD marks the end of NEPA process.

Written comments can be mailed or hand delivered to the BIA's pacific regional office or you can email comments to Chad at the email address shown on this slide.

And that concludes my presentation.

MR. BROUSSARD: Thank you, Ryan. That presentation will be uploaded on the website, if anyone would like to take a look at it. That's at reddingeis.com.

So now we're going to proceed with public comments. Remember that all comments will be limited to three minutes. We have a light timer at the podium which is right over here. It has three little lights on top of the podium.

When you come up to speak, the light -- the green light will be on. When you have one minute left, the green light will start flashing. When you have 30 seconds left, it will change to yellow. And then when your time is up, it will change to red and it will beep and we'll ask you to finish up your comments.

Please remember to state your name before speaking and to speak as clearly as possible. Also, to best participate in this formal hearing process, I offer the following ground rules and suggestions. First, summarize your main points within your three-minute public speaking period. Be as specific as you can. Only substantive

comments will be responded to in the final EIS.

In other words, if you tell us that you do not like the analysis in the EIS, but you give no specific rational, there will be very little to which we can review and respond. Second, avoid personal attacks. We understand there may be strong feelings pro and con regarding this project. The best opportunity to state your views convincingly is through a brief actual presentation. Third, it is okay to disagree. The key is to do it in a manner of mutual respect.

I will require you not to make any noises that would distract from the stenographer's ability to accurately record anyone's comments. In addition, if I cannot hear the speaker's comment because of side bar conversations or other disturbances such as booing or clapping, I will stop the hearing until order is restored so that we can hear what's being said at the podium.

Fourth, I will require you to address me specifically with your comments so I can hear what you're saying and so that our stenographer can accurately record your words. There is a microphone on the podium, but please try and speak directly into it.

If you do not address me directly, I will ask the stenographer to stop recording and we'll require you to relinquish the microphone to the next speaker in line.

Finally, the hearing is not a referendum. We are not here to count the number of people for or against the project.

The sole purpose of this hearing is to collect comments on adequacy or scope of the draft EIS, and all comments will be considered equally no matter how many times they are made. So please limit the substance of your comments accordingly, and if someone ahead of you has already made your point, there's no need to repeat it.

Okay. What I'm going to do is call speakers up in groups of three. We have three seats up at the front for that group to sit, and then they'll come up one at a time. We'll call you one at a time.

So our first speaker will be Chairman Jack Potter followed by John McGinnis, followed by Alan Phillips. Please come to the front, please.

Chairman Potter.

Public Hearing PH1

JACK POTTER: Thank you. My name is Jack Potter, Jr. I am the Chairman of Redding Rancheria. Good evening. And I'd like to welcome you to tonight's meeting to discuss our plans for relocation of our gaming facility.

PH1-01

This area is the traditional homelands of our people. We have been on these lands since time immemorial and we are fortunate to walk on the same lands once occupied by our ancestors. Unfortunately, maintaining our

existence on our traditional homelands hasn't been easy.

In the mid 1800s, ancestors of the tribe signed treaties with the United States reserving large sections of our aboriginal homelands for our use and benefit. Sadly, the United States' obligation of these treaties would never be honored. Instead, in the early 1920s, the United States gathered our people and moved us onto a small 31-acre tract of land that would become the Redding Rancheria.

This land was meant to provide permanent homeland for the tribe and its membership, but the United States again failed to honor its obligations to the tribe. In 1958 our sovereign status and the sovereign status of our land was terminated by the United States. We spent the next 30 years fighting to restore our sovereign governmental status and have spent the past 60 years fighting to restore a land base to support our people.

PH1-01
(Cont.)

And despite the United States' failure to abide by its promises to our people, it economically falls to us to purchase and restore lands so that we may provide for our people now and in the future. It has been 35 years since our government-to-government relationship with the United States has been restored, and during that time we have worked diligently to restore the sovereign status of our rancheria lands.

Although we have been able to restore a small portion of our land base, we've now reached a point where restoring additional on Rancheria lands is impossible, and the lands we have been able to restore are insufficient to provide for our people. Relocating our gaming operation to our property along I-5 is a critical part of our ongoing efforts to restore our land base, provide for our people and contribute in a meaningful way to the overall wellbeing of the Redding and surrounding area for the good of everyone who calls this area home.

And just like the tribe's existing gaming facility, the new gaming facility will benefit the Redding community as a whole. With the proposed develop, we are working to create jobs and economic activity in this area that will benefit the whole community. The tribe prides itself on being -- leading by example in community development and land stewardship so that we are part of the broader efforts here to secure a vibrant economy in Shasta County and a bright future for ourselves and generations to come.

PH1-01 (Cont.)

This land is important to us. The future of our people is important to us and this community is important to us. Whether you support or oppose our project, we are glad you are here tonight to learn more about our plans, and we look forward to hearing your input on how we can

best move forward. I would respectfully ask everyone to keep your comments to the EIS, because at the end of this we are still community neighbors and we must all get along. Thank you.

MR. BROUSSARD: Thank you, Chairman.

Council member McGuinnis.

JOHN MCGINNIS: Thank you. My name is John McGinnis, tribal council member. I have 19 years of gaming experience and ten years of tribal leadership. We've watched from afar on the coast and we've watched the people of Redding Rancheria in Shasta County. It is applauded what they have done for the County of Shasta.

Other tribes should model what Redding Rancheria does for the people. I look at the Redding Rancheria as having PHD. That's passion, heart and desire. The passion for their people to become better in every single day with a passion for their community. The passion when strife happens, they open their doors and wallets to help become a better neighbor.

The heart of a community, not only in Shasta County or Tehama County or Siskiyou County, all the way out in Humboldt County, the Redding Rancheria has shown support of their neighbors.

One amazing program that I want to speak of is One Safe Place. One amazing thing this tribe has done for

PH1-01 (Cont.)

Public Hearing PH2

PH2-01

this community is One Safe Place. If you don't know about it, look it up. They have great information on it.

Also, is the desire. The desire to make the community as a whole better. I was shopping today in the local stores and I asked their opinion of what they thought of the Redding Rancheria.

They said "Oh, my God. That place is amazing, what they do for our community. My cousin works there. The things they do for the local stores, the things they do for the local community is outstanding. They not only touch the people in this community, they reached far back as South Dakota to the eastern sea.

Native people as a whole are stewards of the land. That's why this EIS is so important to these people. This is their land. This is their cultural spot. They've had it from time of immemorial, like the Chairman says. That's what they're here for. PH2-01 (Cont.)

Giving. The desire to give. Over $3.2 million since 2002 that their community fund has given. That's just absolutely amazing. They don't have to do that, but they do that from the kindness of their heart. So that's all of why I wanted to come over here today. My tribe supports the Redding Rancheria and what Win River does for the community of Shasta County. I want to thank you for allowing me to speak. Thank you.

Public Hearing PH3

MR. BROUSSARD: Thank you.

Mr. Phillips.

ALAN PHILLIPS: My name is Alan Ernesto Phillips. I reside in Redding. I currently serve as Governor Brown's appointee for the 27th District Agricultural Association. And I also serve on the hate crimes task force under the U.S. Attorneys Office in the eastern district of the capital.

Additionally, I am a cofounder and retired chairman of the Northern Hispanic Latino Coalition. I'm a first generation citizen of the United States, born and raised here in Shasta County and a decedent of the Pipil tribe from Central America.

The local native citizenry have always been good lifelong stewards of the land and it's varied sometimes delicate resources. That commitment from them is never going to change in Shasta County. PH3-01

The Redding Rancheria has engaged a team of experts to ensure this project does not harm their ancestral land and the fish, wildlife that thrive on it. Key assets, I might add, that collaterally also support the tourist, recreational, entertainment and real estate industries.

Related to open space with only 37 acres out of 232 acres farmland, the remaining 195 will be privately

held open space. For traffic, I've personally reviewed a 10-year commercial and residential development plan for Highway 273 south of Redding connecting to South Bonnyview and over to Interstate 5. The traffic infrastructure is obviously inadequate to handle that amount of development.

The Redding Rancheria project and other nearby developments, existing traffic problems by examining several solutions really should be looked into because I think they're very important and supportive of this project.

It's important to realize that the tribe will not be operating two casinos at ones. Closure of the existing Win River casino would reduce the traffic to the new casino facility. In addition, some of the proposed development nearby, such as Costco, et al, would experience feet traffic at different times than the new casino facility.

PH3-01
(Cont.)

For economic development I could delineate all of which you probably already know from the tribe and from the Rancheria. Look at it because it's very important.

MR. BROUSSARD: Thank you, sir. If I can have you wrap up.

MR. PHILLIPS: Yes. As a public servant to myself, I will formally state my reputation that your decision in favor of Redding Rancheria's healthy expansion

efforts will be reciprocal in deeds, evidentiary deeds, that will make you look good for your support of this project and a diverse entrepreneurial potential. Thank you.

PH3-01 (Cont.)

MR. BROUSSARD: Thank you.

The next three speakers will be Susan Jensen, Esteban Pizano and Joanne McCarly, I believe. Please come up to the front row, please.

Public Hearing PH4

SUSAN JENSEN: Good evening. My name is Susan Jensen. I'm executive director of the California Nations Indian Gaming Association. I've had the honor to serve the tribes of California for the past 21 years and have seen firsthand how tribal government gaming has transformed the lives of Indian people as well as the community surrounding their reservations.

Historically, tribal reservations were located in rural communities with little economic opportunity. Prior to the passage of the Indian Gaming Regulatory Act, many tribes had debt property completely dependent upon the federal government. Tribal government gaming changed that. It has provided tribes the opportunity to generate critical government income. And I stress the word "government" here because it's important to understand that tribal casinos are not commercial for profit businesses.

PH4-01

Tribal government gaming revenue is taxed at 100 tax rate with all net revenue going directly to the tribal government. Unlike commercial enterprises, they restrict how tribes may use gaming revenue generated by the tribal government, specifically to fund tribal government gaming operations, to provide for the general welfare of the tribe and its members, to promote tribal economic development, to donate to charitable organizations and to help fund operations of the local government agencies.

The purpose of this mandate is to ensure that revenues generated by tribal casinos are used to create and maintain strong tribal governments. Redding Rancheria is an exemplary example of this. Although considered a small/medium casino, the positive impacts made possible by revenue generated by the current Win River Casino are substantial.

PH4-01
(Cont.)

Redding Rancheria through its casino revenue is able to provide its members with health care, scholarships, after school programs, wellness classes, elder care and the list goes on. In addition to these services, the tribal government funds much needed infrastructure and economic development projects. The tribe has invested in multiple businesses as part of its economic diversification strategy to ensure economic self-sufficiency and self-determination.

I'm going to skip because my light is going on. Some may say that writing a check is easy, but it's important to remember that every dollar the tribe sends outside the tribe is a dollar taken from a tribal project. This means less money for roads, infrastructure, health care.

The decision to support something financially is not taken lightly. They do it because it's their home. This is the area their children live, where their non-tribal friends reside, where their ancestors lived for thousands of years. The tribe will never pack up and leave the area. This is their historical home.

PH4-01 (Cont.)

Because of this deep bond, the tribe has a longstanding history of giving back to their community. That's been discussed as charitable contributions they've made. Also, I want to go into the proposed casino project will create 2,120 construction jobs, resulting in 23.9 million in wages. I will submit the rest. Thank you very much.

MR. BROUSSARD: Mr. Pizano.

Public Hearing PH5

ESTEBAN PIZANO: Thank you. My name is Esteban Pizano. I'm here to express my support for Redding Rancheria's Win River Resort Casino expansion and move to the interstate.

PH5-01

I am currently the Information Services Director

at Redding Rancheria tribal administration. The tribe has been extremely supportive of my educational and employment pursuits and has the resources to offer such support in large part due to Win River, which I am very grateful.

My children and I are Wintu and enrolled members of the Redding Rancheria. I was born, raised and lived in southern Oregon. My Wintu family is connected to the land you are discussing, the strawberry fields and throughout Northern California and has been since before recorded history. My great-great grandmother, Katherine Lowery, my great grandfather, Les Sotorian (phonetic) and great aunt were residents of the Redding Rancheria, living next door to each other. My Grandfather Warren was raised on the Rancheria with his siblings, uncles and aunts. It was an important gathering place.

PH5-01
(Cont.)

In his late teens my grandfather moved to Oregon in search of work and economic opportunity not available to him in the Redding area. There he met my grandmother shortly after he served in the U.S. Army, spending time in Texas and Germany. His father and his grandfather were also military veterans. My grandfather would often bring my mother to visit on the Rancheria. As I grew up, my mother did the same for my siblings and I.

Our bond to our ancestral home was in this way maintained from one generation to the next. In the 1990s

the Redding Rancheria had to make difficult choices. It had a very small land base with little economic opportunity for its members. The choice to sacrifice the family home to make way for Win River, which would bring jobs and opportunity to our members and a larger community, was one that my family and others volunteered.

It meant an end to over 70 years of our family living on the Rancheria, but offered hope that some day the tribe would be able to acquire additional lands so the many displaced tribal members could relocate their homes to our ancestral homeland, if not back onto the Redding Rancheria.

Over the course of the last 23 years, I've participated as a member in tribal activities, volunteered with committees and been employed at Win River Casino, the Redding Rancheria Economic Development Corporation and tribal administration. Currently and in the past I commute 150 miles each way from Klamath Falls. I stay at locate hotels or with family. This has been a challenge, and the lack of available housing on the Rancheria is the main reason we have never moved home. Myself, other tribal members, the tribal government have long envisioned the time when we could expand our land base.

It is exciting that in the near future many Redding Rancheria members, including my adult children, my

PH5-01
(Cont.)

family and extended family may have greater employment opportunity and the ability to move back to our ancestral homeland as a result of the relocation and expansion of Win River Resort and Casino.

Please join me in supporting the Redding Rancheria's effort to move the strawberry fields into federal trust status to be used in the manner that will benefit the entire Shasta County area.

PH5-01 (Cont.)

MR. BROUSSARD: Thank you.

Ms. McCarly.

Public Hearing PH6

JOANNE MCCARLY: My name is JOANNE McCarly and I am a long-time resident. I've lived here my whole life. My parents came here in 1936. I love this community very much.

I recall what times were like before and since Redding Rancheria, Win River Casino. I have seen such a great difference. I have a nonprofit agency. I'm the founder, director of Shining Care. Our mission is to help meet the unmet needs of elderly disabled adults and their loved ones.

PH6-01

Redding Rancheria has supported our efforts. They've provided the resources that we couldn't find anywhere else, so they have been our first gate keepers. They were one of the first organizations to get trained how to recognize when our older adults are at risk and to

refer them to services and help. They've worked collaboratively with us to find those isolated seniors and really help them, whether it's just a -- someone from the Rancheria or one of their neighbors.

More recently, they've -- they were going to put on an elderly abuse prevention symposium. Their facility is phenomenal and we were able to bring a renowned speaker out of San Diego, so I believe that having more improved types of places for community services like that will be beneficial. So -- what else do I want to say.

I just appreciate the Rancheria and I believe that their growth will benefit our entire community. Thank you.

PH6-01
(Cont.)

MR. BROUSSARD: Thank you. So the next three speakers will be Maria Orozco, Diane Kinyon and Craig Wages, Jr. Please come up to the front row.

Ms. Orozco will be the first speaker.

Public Hearing PH7

MARIA OROZCO: Hello. My name is Maria Orozco. I am a member of the Pit River tribe, Ajumawi Band. I am currently Director of PR for the Redding Rancheria. I started with the position of task clerk at Win River Casino in November 1994. In May 1999 I moved to the position of Event Supervisor. I began actively building relationships and getting involved with the community.

PH7-01

The tribe has given me every opportunity to become

better at my job by extensive training and education. They provided the way for me to seek to attain two AA degrees and my Bachelors Degree from the University of Phoenix in 2014 by paying 100 percent of it.

The Redding Rancheria cares deeply about Shasta County and its surrounding areas. They strive to help fellow community members when they are in need of assistance. The tribe gives back to our community in so many ways. We wish to not only improve the development of the Redding Rancheria, but all local community organizations. Some examples of those organizations are the City of Redding Millenial Celebration, Anderson Explodes, United Way, Rotary Club of Redding, Redding Chamber of Commerce Business of the Year, Anderson Chamber of Commerce Business of the Year, Shasta Community Action Advisory Board, Think Pink, the Relay for Life for 20, Viva Downtown Committee, Make a Wish, We've Walked a Mile in Her Shoes, and Dancing with the Stars.

PH7-01
(Cont.)

We've held community events such as the Stillwater Pow-Wow. We've had the largest Halloween carnivals, Easter egg hunts in Shasta County. The major ways the tribe gives back is the sharing fund, the general fund and community fund. Profits from our generated revenues go back to the development of the community outreach. For some organizations such as $250,000 for the new One Safe

Place; 300,000 to the Cascade Theatre; 400,000 to Redding Aquatic Center and $250,000 to fund additional staff at Shasta County DA's Office. That's to name a few.

The biggest event we host is Redding Rancheria community fund dinner. It is a way for us to raise money from qualified donations. Our average grant is $4100. We give $3.2 million back to 782 of those grants to 316 organizations unduplicated. (Inaudible portion) These donations come on top of the local state and federal contributions required by law.

PH7-01 (Cont.)

The fee to trust casino project will not only bring benefit to native American people in the area, but all members of the community. Through the continuation of this project, it is our hope that the Redding Rancheria will meet more avid goals in building and continuing in local groups and organizations.

MR. BROUSSARD: Thank you.

Public Hearing PH8

Ms. Kinyon.

DIANE KINYON: My name is Diane Kinyon and I'm a former team member of Win River Casino. I'm here to give testimony in support of a new casino. It was my honor to be the Director of HR for 17 years. As my background is in human resources, I asked myself a question on the way over here today "What does environmental impact look like from the human side?"

PH8-01

Is it just cleaning up land? If so, because of Redding Rancheria, the Clear Creek is glowing and clean again after years of not. Now there's a walking path and a spiritual center for everyone to enjoy. Because of improvements, there's safe water to all residents and all visitors. Now there are paved roads, sewers, streetlights, gutters, curbs and landscaping that was all done with respect for people, land, animals and plant life. Yes, trees and plants were moved to save them.

The tribe created a safe environment with onsite security 24/7, a fully equipped medical group as well as up-to-date safety programs which actually work. Yes, that's what positive impact looks like. But isn't there more? The tribe is committed to helping people. They are committed to people with before profit.

PH8-01
(Cont.)

They have helped employees with legal issue, IRS issues, credit issues. They've helped many purchase their first homes. As you know, our team members pay sales tax, property tax and income tax besides living expenses like food, entertainment and child care here in Shasta County.

The Redding Rancheria provides jobs to people of all types, native, non-native, all genders, old and young, but also some that you don't know about, some of the forgotten people, like the ones living under the bridge or the ones with no employment history or the poorest of the

poor who need income just to make ends meet or no formal education.

From the beginning Redding Rancheria has continued to provide jobs and assistance to everyone, giving chances time and again and having overwhelming success at it. Yes, that's what a positive impact looks like. Redding Rancheria provides an environment that is family, and just for bragging, one of the best benefit packages, more than usual paid holidays, paid vacation, bonuses, birthday parties, awards and rewards and much more.

Many employers provide health, dental, vision and retirement benefits, but do they provide or build a shower when some employees don't have one? Do all employees believe in -- do all employers believe in every single employee? Yes. There are many environmental impacts a new casino will have and they all look human. Thank you.

PH8-01 (Cont.)

MR. BROUSSARD: Thank you for your comment.

Mr. Wages, Jr.

Public Hearing PH9

CRAIG WAGES, JR.: Thanks. Can you hear me? Mic check. I'm not used to having one of these. I'm loud enough. My name is Craig Wages, Jr., and I used to work at Win River Resort and Casino. I am in support of the Redding Rancheria because it changed my life.

PH9-01

I was born six weeks premature. I was condemned to death. The doctors told my parents I was not going to

make it. Okay. My dad fought to make sure that I lived and when I turned 13 he died of a heart attack. I came home and he was dead. I did not believe I could do anything with my life. I did not think I could make a difference with my breath and the pumping of my heart.

I was given an opportunity to interview with Win River Resort and Casino, and at 20 years old I became a housekeeper and it gave me a mission, a chance to change. Within a year and a half I got team member of the year. I was awarded a thousand dollars. I lived without electricity because my roommate forgot to pay it, all right, but I still went to work. I still was happy. It changed my life.

PH9-01
(Cont.)

I met my wife there. I have two children. We own a house. One time my white picket fence was demolished, but Jack Potter and Gary Hayward changed my life. They believed in me to give me a chance. I became their training specialist and helped every single team member that was hired from 2007 to 2012. And if you were in one of my trainings, you know I gave you all of my heart and all of my soul.

Okay. Now, I do not work there anymore. You know why? Because of the benefits Win River pays. It pays my fiance enough money to where I get to stay home. I'm a stay-at-home stud with my kids. I get to watch my son

laugh and giggle. I get to watch my daughter run amuck and be a cross-country runner. I get to see my son play with dinosaurs.

This is who I am. It's because of the Redding Rancheria. Every facet of my life they have changed it and made it better. When I was younger, we were poor. I didn't have money to get brand-new things and my mom and dad didn't get to do like, you know, husband and wife dates, but they did go to the casino sometimes and gamble responsibly.

My dad went there one night and he won two Bingos He bought me and my brother brand-new bikes. The night before he showed us, we got in a fight and he grounded us and we had to look at those bikes for a week. Okay. I didn't have Christmas presents when I was a kid. We went to the event center at the Rancheria and they gave us free toys. They let us pick out toys. We got to meet Santa, sit on his lap. And I remember this.

PH9-01
(Cont.)

They've also raised money to build a playground for the kids at...(inaudible). This is why I support the Redding Rancheria, and let's build this baby.

MR. BROUSSARD: Okay. The next three speakers. The first will be Tom Reeits. Tom. There we go. Frank Treadway and Joe Furnari. Apologies for butchering everyone's name. Please come to the front row.

Public Hearing PH10

Tom.

TOM REEITS: My name is Tom Reeits and I'm representing the Churn Creek Bottom Homeowners and Friends organization. We are very passionate about land use. We have a membership of approximately 200 households. Our organization's mission is to maintain an agricultural zoning and rural life enjoyed by our residents and surrounding communities as well as preserve it for future generations.

The 232-acre proposed develop at the northwest corner at Churn Creek Bottom is zoned A7. It is classified as grazing land by the Department of Conservation. For many years strawberries were grown on this land and more recently the land has been grazed by cattle. Agriculture land serves the community in many ways, allowing the production of food and fiber and create a rural aesthetic appearance. PH10-01

As people drive north on I-5, they have the opportunity to see the entrance to Redding as a beautiful open space with wildlife and cattle. If this development is allowed, the entrance to Redding will be a casino and a large paved area with multiple buildings. We are opposed to this loss of agricultural land and the loss of rural community aesthetics.

Additionally with the development comes the risk

of other non-agricultural development in Churn Creek Bottom. We are concerned about the ground water for those who live in Churn Creek Bottom and the effect this development will have on the ground water. We are concerned about having a sewage treatment facility on this parcel for a large development such as have been proposed. Our concerns in this area are also for the Sacramento River. We are concerned about this project's effect on the social and economic challenges of the community due to the gambling addictions, and we are concerned about the need for additional law enforcement resources and crime rate for neighborhoods near this development.

PH10-01 (Cont.)

The Churn Creek Bottom Homeowners and Friends are against this development and against this land being included in the tribal trust for the Redding Rancheria. And I'd like to say that we really don't have a lot of good farmland in our county. To the west we have rocks and mountains. To the east we have some farmland, but a lot of it is high elevation with a short growing season. We don't have a lot of really good farmland and it's not good to pave over it. It's just not good planning.

MR. BROUSSARD: Thank you, sir.

Public Hearing PH11

Mr. Treadway.

FRANK TREADWAY: My name is Frank Treadway. I live in Redding as of 1995. Prior to that I lived in

PH11-01

Anderson from about 1945. I first became aware of indigenous people when I met Barbara Hayward and Sharon Hayward and their brothers in Anderson High School. We became close friends. We were in the cowboy/cowgirl world. We rode our horses all over the area here.

Every weekend I'd ride my horse ten miles to the Rancheria, the little acreage there on Clear Creek. I saw firsthand the deplorable situation of the Hayward family and other families that lived there on their former own land, having to live in that disgusting environment, getting water from Clear Creek and boiling it.

We continued, of course, as friends for many years. Barbara and her tribal members were able to come together and bring the current casino somewhere around 1993 after many years of planning and tribal discussion to raise the hopes and income of their tribal members.

PH11-01 (Cont.)

And now the tribe again might seem to have to beg for their tribal land, their original land, to be turned back over to them. I don't understand it. And as far as competition between other casinos like Rolling Hills and Win River itself and the Rain Rock Casino in Yreka and Pit River and other Northern California casinos, people think it will be undue competition.

I don't have any evidence, but I suspect people in their campers and their RVs travel from casino to casino.

The money's spread around. There's no problem with the competition. So I am in support of the new casino on the original lands and I think that you will, too. Thank you.

PH11-01 (Cont.)

MR. BROUSSARD: Thank you.

Mr. Joe Furnari.

Public Hearing PH12

JOE FURNARI: My name is Joe Furnari. Thank you for giving me the opportunity to speak. My wife and I recently lost our home in the Carr Fire. We built it ourselves nearly 40 years ago. We raised three boys there. Our spirits were broke, yet the river was healing. We decided to spend our life savings in order to purchase a home directly across from the proposed project that we have here that we are discussing tonight.

PH12-01

We were certain that tribal elders and the Bureau of Indian Affairs would never exploit our beautiful Sacramento River and the surrounding areas. You hold the power to create that river sanctuary we can all be proud of, peaceful, quiet solitude where souls heal and spirits sore.

The expansion of the existing location would serve our community better. Please don't have an eyesore on I-5 coming into our town. Thank you.

MR. BROUSSARD: Thank you. The next three speakers will be Michael Burke, Linda Mitchell and Garth Sundberg.

Mr. Burke will be the first speaker. Everyone else please come to the front row.

Public Hearing PH13

MICHAEL BURKE: Hi. I'm Michael Burke. I'm the executive director of the Child Abuse Prevention Coordinating Council. In 2012 I founded a camp called Campco Shasta. It's a camp for kids exposed to child abuse, sexual assault and domestic violence.

One year we had a young tribal boy who had come, 14 years old, and he was very angry. At the time I first met him, he was upset about getting on a bus and traveling north 30, 40 miles up to Siskiyou County. He was just really angry. So we got on the bus together and we asked him what did he want to do with his life.

He said "It doesn't matter. I'm going to be dead or in jail by the time I'm 18 years old. I have people in Redding chasing me with Glocks," which is a gun. PH13-01

The boy had no hope. Because of the tribe and because of the Redding Rancheria, I have been through multiple competency trainings and I knew working with tribal kids you have to take a different route. This boy had sage with him that he needed to burn. And because we were in a camping environment, we didn't burn it. He let them grind the sage over the fire and that took care of their needs.

I, as the director and a white guy, didn't know

these things, and I was able to help this boy. In that week the tribal government came up to camp and did leadership training. Gary Hayward sat with this boy and talked to him as a tribal member. It's the kind of influence that the tribe has in our non-profit community. Not only with tribal kids, but with all children who come in Shasta County and beyond.

I've watched that young boy that week go from a child who thought he was going to be dead or in jail by the time he was 18, gain confidence, gain hope and gain healing, not only because of the funds the tribe provided to this camp to help heal him, but because of the passion and heart of the tribal members.

PH13-01
(Cont.)

I cried with the tribe that week. I laughed with the tribe that week. Because of their heart and because of their caring, this boy by the end of the week when I asked him "What do you want to do with your life now?" He said "I want to come back and be a counselor."

So he went from better in jail to six days later wanting to come back and change the life of others because of the influence of the tribe, because of the funds they provided for him to go to camp.

I sat with Barbara Hayward, one of the original tribal founders. She told me about the seven-generation approach, that she's looking to seven generations.

Barbara passed last year and I always think about her when I think about this project. If every one of us looked at seven generations down the road, we wouldn't have the troubles we have. But this project, seven generations from now will make a stronger community from this point forward.

Thank you for your time. I really do support this project.

PH13-01 (Cont.)

Public Hearing PH14

MR. BROUSSARD: Thank you. Ms. Mitchell.

LINDA MITCHELL: Thank you for letting me speak tonight. The proposed new site will help restore housing, create potential thousands of jobs if they build a new casino, bring revenue into our county, the City of Redding, Anderson.

During construction that will all go to hundreds of continual full-time jobs. Win River hosts many community events which generate money for the community, events, surrounding communities and they allow the casino to generously donate throughout the county. In 2018 I know $200,000 that was given out.

PH14-01

Some of the events they hold, Kool April Nites Show and Shines, Shasta County Peace Officers awards, Stillwater Pow-wow, kids toys and many more. And I have been honored to work with Jack Potter and the many members of the Win River Casino and much of my activities over the

past 15, 20 years has been the generosity through our agricultural awareness in the city -- and I still call it Central Valley because I lived there since '74 -- City of Shasta Lake, and various, various community activities. Thank you.

PH14-01 (Cont.)

MR. BROUSSARD: Thank you.

Public Hearing PH15

Mr. Sundberg.

MR. SUNDBERG: I'm Chairman of the Trinidad Rancheria and Chairman of the Northern California Chairmen Association. Trinidad Rancheria is going through the same thing that Redding Rancheria is going through. We're building a hotel on trust land. I know there's not a trust planned yet, but we asked our (inaudible) we're going to put in trust, too. The same thing, but we're going to the Postal Commission, and we got to go through the comment period. And we really got beat up on this in the media, papers, radio, you name it, we got beat up on it.

PH15-01

It gets tiresome, so I know what it's like. I know it's the hoops to jump through. No one opposes that. And I know Jack Potter well. Redding Rancheria is really trying to get along with the community. I know that -- I've been in the construction business for a long time. I know what construction looks like, and they build a nice facility. That facility is great. The tribal

office is nice, their casino is nice, hotel.

So people need to understand tribes and not say a lot of racist things about them, because I've been called all kinds of stuff and it hurts pretty good. I just sit there and take it. I don't like to say this here because it's not my project.

But anyways, my CEO and my vice chair were down at the Postal Commission for their meeting, and one of the questioners asked "Why are you doing this?"

It's because tribes need to control their own land. And only Redding Rancheria can do it, do a good job of doing it. So it turned out the Rancheria supports it, Northern California Chairman Association supports it and I'd like to thank Jack for working real hard and good luck. Thank you.

PH15-01 (Cont.)

MR. BROUSSARD: Thank you. The next three speakers will be Jean Murillo. I'm not sure either if those are right, Robb Karinke and Alan Hill.

Please come up to the front.

Jean Murillo.

Public Hearing PH16

JEAN MURILLO: I'm a little short here. I will speak really loud. My name is Jean Murillo. I've lived in Redding since 1962. I love this place. And when the issue of Indian gaming came up before the voters, it was presented to me on reservation land only. So I know

PH16-01

myself and the other people that I had discussed with, we always thought that it was to be only on the original reservation land.

I believe that that is being misrepresented because now if this is going to be reservation land, when does it -- is everything reservation land? And so I would like to say I've heard how wonderful the casinos are. I didn't want to live in Nevada. I didn't want casinos. But if casinos are so wonderful as I hear, let's bring Harold's Club, the Bellagio and all these other casinos into California because they're such a good thing going.

I am totally against having this land being for the casinos coming into Redding, and I think that they should be on their original land that they said when the voters voted.

PH16-01 (Cont.)

MR. BROUSSARD: Thank you for your comment.

Robb Karinke.

Public Hearing PH17

ROBB KARINKE: My name is Rob Karinke. I'm here on behalf of Speakup Shasta Coalition. We oppose the project. I have here petitions, individual petitions, we gathered in Shasta County. 100 percent of them are from Shasta County. Most of them are from City of Redding.

PH17-01

There's over 5,000 petitioners here opposing the project. We started weighing how many petitions we have versus actual counting them. I'd like to read what the

folks have signed.

"We the undersigned oppose Redding Rancheria's expansion and relocation of Win River Casino to strawberry fields. The proposed development poses numerous risks to the Shasta County community. It would have serious negative effects on local fish and Wildlife and result in cause of traffic congestion....(inaudible)....a significant blow to Shasta County's outdoor sports and recreation. We urge the BIA and all its representatives to reject this proposal."

There is significant community concern about this project. 5,000 people have signed the petition in opposition. We feel this comment period is being rushed. We thank you for the extension you granted of a couple weeks. We ask that be extended five weeks. We submitted a 5,000 page technical document to the community which requires experts to review. This is a totally inadequate amount of time.

PH17-01 (Cont.)

Secondly, we ask that you take a harder look at the traffic scenario. The City of Redding has created a draft comment letter where they called out the fact that the traffic report included in the EIS does not account for rush hour. Your estimate says 13,000 trips a day. It could be significantly higher.

There's been a lot of talk of stewardship, and we

respect that, but the fact is this project is proposed on land that is critical habitat to salmon. It is thought to be among the last five percent of the river that is suitable for...(inaudible)... of these fish With spring run salmon. Additional endangered species include bald eagles, steelhead as well as native plants.

Noise. Your EIS does not really account for the inclusion of an outdoor amphitheater which was proposed on the project. We don't know where. We do not know under what conditions the events will be held there. It's been mentioned that this project goes into the city's general plan designated as a green way to agriculture. It's a very significant paved project.

PH17-01 (Cont.)

We'd like you to take a harder look at impacts of local businesses. There's obviously the civil auditorium will compete with the amphitheater. Certain proposals included in your certain options...(inaudible)...our local businesses that will obviously compete with downtown businesses. So thank you respectfully on behalf of 5,000 petitioner's here who oppose it.

MR. BROUSSARD: You can submit those comments with us. Electronic or hard copies, either way will work for us.

Public Hearing PH18

Mr. Hill.

ALAN HILL: Hi. Thank you for the opportunity to

PH18-01

speak. Members of my family have lived in Churn Creek Bottom since 1892, so we know what it was like and what we had over the years with respect to Churn Creek Bottom. It's an agriculture area. It's not a commercially developed area. The only commercial facility down there now is the TA Truck Stop and it should remain that way.

We support what the casinos have done. We support the Win River project putting that together the way they have. It's been a big benefit to the community and we totally support the expansion of that facility at that location at this time.

If anyone has any doubt about the traffic issues in that area, all you have to do is try to cross the bridge on I-5 or go all the way out Bechelli Lane or Bonnyview down to Churn Creek Bottom today without much development. If you add the Costco project on the east side, this project -- I mean, there needs to be another bridge across the river or something.

All we know is that if you squeeze that traffic 13,500 vehicles into that area down to the casino out through the northern entrance of that is absolutely short sided. So for those reasons we continue to support the project, its location, expand it in the area. Thank you.

MR. BROUSSARD: Thank you, sir.

The next three speakers will be Christi Hines of

PH18-01
(Cont.)

Win River, Jim Morrow and Dan Frost.

Ms. Hines.

CHRISTI HINES: My name is Christi Hines. Can you hear me? My name is Christi Hines. I'm the Chief Financial Officer for Win River Resort and Casino and our economic development corporation .....(inaudible).

I really came to speak about passion and desire. I couldn't be more proud to work for an organization. I've been very blessed working with great organizations. I spent my public accounting time with Matson and Isom. I worked for Sierra Pacific Industries.

I found my home 16 years ago when I came to Win River Resort and Casino. My in-laws are native American and up until about five years ago, I really didn't have this grass root native drive in me. What I had was a passion for an organization which was truly invested in its community. It's not only part of who they are. It's part of their values.

It's one of the things that they expect from each and every one of their management and executive teams is you get out there and you get involved in their community. How incredible is it that you get paid to be a part of the people that you get to work with everyday, working for groups like One Safe Place, being a grass roots organizer for Shasta County Justice Center, some of the most amazing

Public Hearing PH19

PH19-01

people and causes that I've ever been so fortunate to come in contact with.

These values have allowed me to just personally take part in something that's so inspiring and passionate that I had no idea. About five years ago I did give birth to a little boy who is a true native and now I have a dog in the fight. Right? It's brought me way more aware of what's going on in native country and the economic disparage that's happening with Native Americans.

I think for all of us having a child gives us a bigger prospective of having purpose, and so now I focus more on what the future of native Americans should look like and how these communities can prosper, grow and flourish and it is only through economic development, expansion, restoring traditional lands back to natives, creating new jobs, providing adversity.

PH19-01
(Cont.)

Remembering that these expansions like Win River Redding Rancheria, all these expansions, they helped other tribes that don't have compact -- that don't have any type of economic diversification. They have revenue sharing trust funds. They help create jobs and bring dollars into our communities. A big thing is mitigation, tribal mitigation, local impacts, roads, law enforcement.

So I will finish up right here. I have always known the Redding Rancheria to be a kind, generous tribe.

I have no doubt moving forward they will be just as kind and generous, and I'm honored to be a part of the PHD Club because I think they are just inspiring as a culture and a tribe.

PH19-01 (Cont.)

MR. BROUSSARD: Thank you.

Public Hearing PH20

Mr. Morrow.

JIM MORROW: Thank you. First of all, I'd like to a lot of comments about the Rancheria. They've done an awful lot...(inaudible).... I've seen that growth and I appreciate it. But I do have some comments.

They want to put an amphitheater in. In evenings when the wind dies down, the reversion here develops and it's cold air sliding under the warm air. That traps sound, traps light. For example, during the day I'll hear the freeway off in the distance through the trees. The sounds going up, goes on up. As soon as that diversion layer comes down, the sound bounces. It sounds like it's right in your back yard. As it comes up higher, it goes over to 273.

PH20-01

All of a sudden the trains that are miles away sound like they're two blocks away. When I look up online, a train puts out 120 decibels...(inaudible portion)... For every ten points in decibels, the sound comes twice as loud. The amphitheater will be fighting the freeway traffic. It's going to be 77.5 decibels. I

think it should be contained inside. Amphitheater. It doesn't impact any neighborhood around, but they start up around 6:00 every summer. They have the Mosquito Serenade. If they really want an amphitheater, put restrictions on there. Only be used an hour after sunrise to an hour before sunset.

The future hotel. My comment on that is it's going to block the use of the residents looking at the mountains. One picture was taken right by my house. I saw a site plan that showed a potential future hotel tower. I didn't see that in the EIR, so I don't know if that's misinformation out in the community or what. But any future plans we should know where it is.

PH20-01 (Cont.)

The traffic. That was another concern of mine is traffic. They're not going to widen South Bonnyview, put a turn lane in from Costco, Bechelli Lane into Costco, and they're going to replace the streetlights with a double roundabout. I don't think it's going to be able to handle the traffic.

One other thing, the green belt. I'd like somewhere in the CC&Rs to hold a 100 year flood. The green belt, no development, no golf course, no camping, no truck stop.

MR. BROUSSARD: Thank you for your comments, sir.

Mr. Frost.

Public Hearing PH21

DAN FROST: Thank you. Good evening. My name is Dan Frost. I'm a 50-plus-year resident of the City of Redding. I live approximately two miles from the proposed project.

First and foremost, what this project will do is destroy the beautiful gateway to the City of Redding. That gateway now consists of approximately 230 acres of pristine land that's used for agriculture that supports approximately a mile of riparian habitat. A riparian provides home for wildlife, is the corridor for bird life, including endangered species, the bald eagle and other species.

If the project at the proposed site goes through, what we will have is a truly monstrous project, one with huge light pollution, one probably with a very great deal of noise pollution, neither of which are adequately addressed in the draft EIS and will create a massive traffic problem absent the expenditure, perhaps millions, of hard earned taxpayer dollars. PH21-01

It is simply the wrong place for this project. I think -- I'm not sure, but you could probably scour the entire county and you couldn't find a worse project -- a worse place for this project. It is pristine, beautiful. That will be converted to a casino with all the noise, light, traffic, none of which are adequately addressed in

the EIR.

The city has in its general plan includes this as green space, a truly valuable thing for all the citizens of Redding, including members of the Rancheria. If the Rancheria really wants to live in harmony, to do what's best for the entire community, I would suggest they select the alternative of increasing the project at its existing site. I doubt that there would be any opposition to battle.

Nothing here, I don't think, suggests any speaker here tonight, myself included, in any way (inaudible) the tribe, its members for the works that it does. We simply oppose this project at this location. Thank you. And I would request that the time for comment on the draft EIS be extended for at least an additional 60 days.

PH21-01 (Cont.)

MR. BROUSSARD: Thank you.

The next three speakers will be first Nick Gardner, John Livingston and Mike Schraner.

So Nick Gardner, the first speaker.

Public Hearing PH22

NICK GARDNER: My name is Nick Gardner. You know I am against the expansion. I like the F plan where they would expand where they were at. But you know until I got here tonight, I didn't realize how many good things the Rancheria does for the community. I applaud them for that.

PH22-01

Why would they need more money for it? It looks like they have plenty. They do plenty of good things. My main concern is the relocation of the crime that goes on down at Win River, and it's going to drag it over to this side of town. Where it's at right now, it's kind of in a cul-de-sac and that's a good place to keep it.

We're going to have impaired drivers on Interstate 5, on Bonnyview, on Bechelli Lane. That worries me quite a bit. You know, Win River isn't going to go broke because of this. They're building a hotel in Shasta Lake City. They've got the Hilton. They've have the mini mart. I'm sure that they've got other enterprises starting up.

PH22-01 (Cont.)

And they've done a great job. I've got no complaints. I have nothing bad to say about them. One of my concerns, my main concerns, about the draft environmental impact report, is that it's down on the river and you've got a green belt going up the river.

It's going to relocate the transients that are kept down on Clear Creek Road now. We've got transients all over, but there's a group down there that stay down there strictly for the benefits of being able to go steal cars and break into cars over at Win River. And they've had plenty of fires down there. If a fire starts at Win River and heads up, there's no place to stop the fire

until it gets to Cypress Street.

I think it would be beneficial to go down there, do a survey now on how many transient camps are down there and then count them after a year after Win River opens up and figure out some way to alleviate that situation.

That's all I have to say. Thank you for taking the time to listen to me.

PH22-01 (Cont.)

MR. BROUSSARD: Thank you, sir.

Mr. Livingston.

Public Hearing PH23

JOHN LIVINGSTON: Good evening. I'm John Livingston. And the strawberry site I'm against it specifically. I'm not against the tribe, but it is promoting urban sprawl. It will provide 25 new acres of pavement and roof tops. The draft EIS, which I spent yesterday and today trying to digest the 600 pages and 4,000 pages of appendices, does not consider hardly any alternative sites except one at Anderson.

I would suggest that you also look at the former old mill developed site in Anderson on the east side of I-5. It has already been diluted of trees. It is above the flood plain and it is very close to I-5. I would also suggest that you look at expanding the -- to the other side of Clear Creek where the gravel has been largely extracted and there is a lot of land that does not contain any environmental values.

PH23-01

Also, we are looking at an Oasis Road site -- or you could look at an Oasis Road site north of Redding which would be right next to I-5. I would strongly urge that you look at additional sites. I would like you to look at extending the comment period at least 60 days to review the traffic impacts and be able to merge the strawberry field site with the Costco site traffic impacts to make sure that both EIR and EIS have consistent traffic assumptions.

The draft EIS says that the light shadows and glare effects will be less than significant. This is not true. The light impacts will be significant. In fact, even the presentation given tonight said that the parking lot will be well lit. There will be a new glare to that portion of Redding. It also says that -- the draft EIS says that the noise will be less than significant. I believe this is not true.

PH23-01
(Cont.)

The only thing that was going to be significant was the traffic in the entire EIS, and it says the traffic impacts will be less than significant with mitigation. So this is not true either. So I would like to close by saying also that the visual impacts will be significant to Redding. I wish that this site could be moved to another site that is less visually impactful to Redding. Thank you.

MR. BROUSSARD: Thank you.

Mike Schraner.

MIKE SCHRANER: Good evening. My name is Mike Schraner. I live half a mile from the site that is in question. That is my home. I'm familiar with the river in that area because I use that boat launching ramp that's adjacent to the property in question.

I would encourage everyone in this room to go to the site. When you see the beauty and the natural beauty this part of the river and then you would place a commercial multi-million-dollar commercial buildings and project in plain view of this natural attraction for which Redding is most famous for, our mountains, our streams, our valleys, our lakes.

PH24-01

Make no mistake this is a multi-million-dollar commercial development for the benefit of few, not for the benefit of the majority of people that love Redding for its natural beauty. Go there and picture what is about to be done and then make up your mind. Is this really what we want? I doubt it sincerely. That's all.

MR. BROUSSARD: Thank you, sir.

The next three speakers will be Cameron Frank, Pam Hughes and Julie Buick.

Cameron Frank will be the first speaker. Everyone else to the front row.

CAMERON FRANK: Good evening, everybody. I am in favor of this project, and one thing that I do know is that when I was coming back home today from Sacramento, when I got over to that bridge that says "Shasta County We Honor Veterans," when I was working over there, there was a whole lot of veterans that were working with me.

How about this war going on? Now we got brothers and sisters coming back. When they come back, they need a job. This thing right here will provide a job. And not only that, it's going to provide blue collar working jobs. They're going to make that road in there. Well, somebody has to maintain that road. That means somebody has to be there everyday.

PH25-01

I notice that a lot of people that are talking against it are baby boomers. You baby boomers, what I see on TV is that a lot of you guys have had to ration out your medications. Sometimes you can't even afford them. This right here, it would -- if you go over and apply for a job, get a job, even if it's part time, they supplement your income for your medications.

Not only that, a lot of you are also having to make a choice, "Do I get my medications or do I buy food?" You get a job over there like that, I mean, hey, that's something right there. Another thing I've noticed is that I notice that there's a lot of baby boomers working there.

And the reason why they're working there is because they're -- you guys are dependable. You guys are a very damn good generation. We need more folks like you, and this casino would benefit from your guys' hard work because you guys show up and work on time.

The other thing is that that road, wherever it's going to be, the tribe has to maintain that road. That's in the contract. Read the contract, guys. That way when you're up here and you're talking, you will know what you're talking about. It's not just like going from machine to somebody's pocket. Indian gaming is highly regulated over the federal government. That means that they're not going to have any wise guys coming in there trying to strong arm the situation. Thank you.

PH25-01 (Cont.)

MR. BROUSSARD: Thank you.

Public Hearing PH26

PAM HUGHES: My name is Pam Hughes. I've lived in Redding for more than 50 years. I went to Shasta High School here.

MR. BROUSSARD: Speak into the mic, if you can.

PAM HUGHES: My name is Pam Hughes. I've lived in Redding for more than 50 years. I taught high school here for 32 years. Redding is my home. I respect and admire my native American neighbors and their contributions to our community, but I do have serious reservations about this project, all of which happen to mention

PH26-01

....(inaudible)... so -- and I'm also submitted in writing to the BIA in Sacramento. So I will give the rest of my time over to the other speakers. Thank you.

PH26-01 (Cont.)

MR. BROUSSARD: Thank you, ma'am.

Julie Buick.

Public Hearing PH27

JULIE BUICK: My name is Julie Buick. I live in Churn Creek Bottom. Churn Creek Bottom is a very small Area in Shasta County. It's eight square miles, class one agricultural soil. If you don't visit there or live there, which I lived west of town most of my life growing up on the west side and it was mostly bed rock and you had to dig a hole with a pick ax and then bring in some soil in order to make anything grow.

This soil is prime. It takes a thousand years to make one inch topsoil, and Churn Creek Bottom is all topsoil. It goes anywhere from 10 to 25 feet, if you can imagine. So you can tell how many years it took. Before any of us lived here, this soil was being made. It can't be replaced. It's like the rain forests. It's like other sensitive, sensitive environmental areas in our world.

PH27-01

I voted for Indian gaming because I felt probably, as a lot of people did, this would be a quick way, not the best way, but the quickest way for Indian tribes to make up for some of the damage that was caused by our government. However, this site is not a good site for any

giant project like this. It is so sensitive there.

The truck stop. Other things have gone in that have septic tank systems that have failed over and over again many times. There's ground water, very shallow there. My well is only 26-feet deep, almost unheard of. It's ground water. So anything that pollutes the soil -- there's no rocks in the soil. It's just beautiful, rich, looks-like-you-can-eat-it dirt. I can't tell you how important that is, these few resources we have left.

And the river itself. There's no way to keep run-off in a pond. There's no way to keep the leach fields from failing. There's no way to pave over and then you can't ever get it back again. You can't. You cannot.

PH27-01 (Cont.)

So I urge -- plus, I really feel like when I voted for the gaming also, that it was to stay on the Rancheria. It was not to then go become wealthy enough to buy that land back. I agree that probably the whole United States could be considered ancestral land.

However, we all have to abide by zoning laws voted by the people for agriculture. Just a few years ago, we put a referendum on the ballot and stopped a shopping mall on the other side of the freeway. It was only 106 acres and a shopping mall. I urge you to stop this project.

MR. BROUSSARD: Thank you.

The next three speakers will be Tom Sanchez, Lane

Public Hearing PH28

Rickard and Cindy Lamkin.

TOM SANCHEZ: My name is Tom Sanchez. I'm against the project. We are talking about stewardship of our land. We're talking about what is best for our future generations. I am concerned with our children and our future generations. A casino right in their backyard is not the place. It comes with its impact. It is very helpful for our Indian heritage, our people. They deserve to have a living and have it good, my understanding that two to three percent of the population.

I believe that this is a horse before the cart. I challenge our supervisors and Reddingites (phonetic) and the Indians to think higher ground to consider greater consequences down the road. I kind of view this as a logistical nightmare. In your plans you say you're going to take your fair share of the costs for maintenance with all the utilities that are needed. It doesn't say "Technically we need nine lanes of freeway to accommodate this kind of chaos."

PH28-01

A Cul-de-sac little loop-to-loop is not going to do the job. I was thinking 20, 40 years down the road what is good for our county. I came up from the Bay Area. I consider this to be ten times the quality of living, plus. I view that this should be somewhere else.

My last statement would be we need more time to

look at this soberly. Right now I think our eyeballs are like casino dollar signs going like this, the impact, the money we can make. I think we need to take a sober look at our children and what will help the entire area. Thank you.

PH28-01 (Cont.)

Public Hearing PH29

LANE RICKARD: Hello. My name is Lane Rickard. I'm a community consultant for the Redding Rancheria. I am a local boy native American Wintu. I stepped into politics when I was 18 when I helped to run Brent Weaver's campaign for city council. I was district rep for state Senator Ted Gains. I was honored with running the Redding district office as a field rep for the past five years.

I got to learn a lot about this community and the many challenges it faces to our economy, places with crime that trump state and national average, development that sometimes lack in comparison to our southern counterparts. Speaking with experience, it truly does take more than government to solve the many issues that need to be addressed.

PH29-01

I've gotten to visit many different communities during my time working in the senate. One thing I can truly say about Shasta County is that it has community organizations like none I have ever experienced before. Everyone sitting and standing here today is proof of that. Time and time again I have been awe stricken by the

efforts that our many wonderful organizations will go to in order to fight for solutions to resolve crises.

When the wave of crime was a burning despair, it was multiple organizations who came to the aid of law enforcement. Where development has fallen, it has been organizations that have contributed to the revitalization of numerous areas of this county. When disaster has swept through homes of friends, families and loved ones we all know, it was community organizations that gave back.

Each time the Redding Rancheria has been one of the leading organizations in this community to support others in times of need. This community has given so much to me and so many people here in Shasta County, and as my time has come to an end, I look for ways to contribute back just an ounce of the opportunity that Shasta County has given me.

PH29-01 (Cont.)

When I left the state senate, I approached the Redding Rancheria solely due to the positive reputation the legacy has built as a key influencer in improving this community. I felt that aiding the Redding Rancheria would be the best way for me to pay tribute back to this community. Their positive reputable relationships, their desire to develop the Shasta County area to the community that it deserves to be, and their ambition to maintain the legacy of local native americans, not just Redding

Rancheria people, but non-federally recognized leaders like myself, our goal is that it should be looked on by this community with pride.

For the benefit of community and the organizations in it, I urge you to allow the Redding Rancheria to continue with the project that is only going to benefit everyone in the county. I would also like to share with the community and the BIA a letter from current Board of Equalization member Ted Gains.

PH29-01 (Cont.)

It says "To who whom it may concern: As a newly elected member for the first district on the state board of equalization, I am writing in recognition of the Redding Rancheria tribal members of the Pit River, Wintu and Yana people. I look forward to continuing my partnership with the Redding Rancheria and my new role as a board member."

I will submit this letter. Thank you very much.

MR. BROUSSARD: Thank you.

Public Hearing PH30

CINDY LAMKIN: Hello. My name is Cindy Lamkin. I am probably going to be affected by this the most. I live very close to the proposed building site. I am right on the other side of the overpass. I have 20 acres of beautiful Churn Creek Bottom, so I will be affected by the noise, I will be affected by the lights and I will be affected by the traffic.

PH30-01

When they put Kids' Kingdom in and they punched Victor through to Churn Creek, I'd wait five to ten minutes to get out of my driveway. I can't imagine what I'll have to do when this goes in. It actually makes me sick to my stomach thinking about it. I also can't wait to see the drunks trying to navigate the roundabout. It should be very interesting. There's a lot of accidents up there.

When they put the roundabouts on Victor, half the people couldn't navigate, so this will be very interesting. I know that that land is prime Churn Creek Bottom soil. There's no reason in the world that Win River can't do all the wonderful things they're doing right now right where they are. They don't need to move there. They don't need to cause traffic jams. They don't need to do any of that stuff.

PH30-01
(Cont.)

I don't know who it benefits except for the tribe. They can expand and have more jobs and give to the community and society just as much on 273 as they can paving over that beautiful soil. That's why we moved there. I moved there in '69 and it's a great place to be. The Churn Creek landowners are a great group of people and we want it to stay that way.

We didn't want the shopping mall. We don't want the casino there. Put it somewhere else. Put it on the

gravel roads or on the bad soil, but don't put it on Churn Creek Bottom soil, please. I oppose it. I would love to see an alternative at the very best. Thank you.

PH30-01 (Cont.)

MR. BROUSSARD: Thank you. We're going to take just a five-minute break. So we'll reconvene at five minutes to 8:00.

(Whereupon a break was taken.)

MR. BROUSSARD: We are going to reconvene and call our next speaker. Agnes Gonzalez, Margo Wilson, Kay Wilson.

Agnes Gonzalez.

Public Hearing PH31

AGNES GONZALEZ: Good evening. My name is Agnes Gonzales. I'm the Pit River Tribe Chair Woman.

My tribe is a federally recognized tribe. It is my pleasure to stand here today in support of the Redding Rancheria Fee to Trust and Casino Project. The members of the Redding Rancheria are good citizens and have supported this community. The casino project will boost growth to the unincorporated Shasta County creating thousands of jobs, from development to construction to the casino to the hotel.

PH31-01

Redding Rancheria members have been here since time immeriol, and I just want to state that they are also members of this community. I've seen signs that say "Not in our community." They are also members of this

community.

In conclusion, I fully support the Redding Rancheria Fee to Trust Casino Project and I look forward to the ground breaking. Thank you for the opportunity to speak. I have a lot of respect for Redding Rancheria. They're very kind, giving people. I've been in their presence, you know, and attended some of their viewings and I witnessed the donations and the help that they give to the community. So I am honored to be their friend. Thank you very much.

PH31-01 (Cont.)

MR. BROUSSARD: Thank you.

Margo Wilson.

Public Hearing PH32

MARGO WILSON: Hi. I'm Margo Wilson. I've lived in Redding all my life.

UNIDENTIFIED SPEAKER: Can't hear.

MARGO WILSON: I'm usually the loudest one in the room. I'm Margo Wilson and I...(inaudible portion)...but I do think that it would create quite a mish-mash in this area. I think it's fine where it is. We do a lot of good things. Win River does a lot of good things for our community, I agree with that, and I hate to see that beautiful area be torn up and built on. So that's all I have to say.

PH32-01

MR. BROUSSARD: Thank you.

Kay Wilson.

KAY WILSON: Good evening. I'm Kay Wilson. Thank you for coming and listening to us. I appreciate that. I think that the Rancheria has finally gotten -- found a way to make money and to do things, and I think that's good. And they've done a lot of things for the community, however, this property is agricultural and I think that, perhaps, they should think of doing something different than a casino.

Perhaps they could do something more in the agriculture area, you know, grow vegetables, grow even flowers. I even all kinds of things they could grow and even have a nursery. We've had one of our biggest nurseries close recently and a lot of people want things -- want plants that are organically grown and it's a big thing. And we need to have -- we need to have agricultural property, especially the way this property is. PH33-01

The soil is so good. You don't get it everywhere and once it's ruined, once you have cement and concrete, asphalt on it, you've lost it. They had that problem in Santa Clara valley and they'll probably never ever get it back, no matter what they do. I think since we have this property that is good, wonderful soil -- and the traffic problem is going to be terrible. I live near Enterprise High School and I know that the -- with all this

development it's going to be terrible.

There's only so far you can widen the streets. The roundabout is not going to work because you have big trucks, big huge trucks, with cargo and it's not going to work. I lived several years in Washington DC where we had what we call circles. They call roundabouts. But they didn't use them for the big trucks. The big trucks is something we're going to have to deal with so the trucks can deliver their goods to the development.

So in conclusion, I'd just like to say I really wish that the Rancheria would reconsider and look -- diversify, not just be gambling, do other things. There -- there's a lot of talent and there's a lot of -- not everybody wants to be inside. Thank you.

PH33-01 (Cont.)

MR. BROUSSARD: Thank you for your comments.

So the next three speakers will be Anne Bonacci, Danielle Brewster and Kristyn Kuroki. Also, Anne Bonacci will be the first speaker. Everyone else to the front row.

Public Hearing PH34

ANNE BONACCI: My name is Anne Bonacci. I am not a member of Redding Rancheria, but I am a California native and member of this community. I wholly support this project because it creates hundreds of new permanent jobs, hundreds of temporary construction jobs for area residents and for businesses around here.

PH34-01

The project will also generate millions of tax revenues not only for our state, but for our city and Shasta County government, which is desperately needed in our county. Over the years Redding Rancheria has raised millions of dollars for many nonprofit organizations in our community.

This is all our community. It is important that all of us contribute to the wellbeing of it. I encourage everyone to do your research. I heard many unfounded statements being made against this project, so please, everyone, research before you speak. Shasta County is growing and it will continue to grow regardless whether or not you support this project.

By supporting the project, you are supporting financial stability of our community and services desperately needed. Thank you for your time.

PH34-01 (Cont.)

MR. BROUSSARD: Thank you.

Public Hearing PH35

DANIELE BREWSTER: Hello. First, I'd like to thank you for allowing me this time to speak. My name is Danielle Brewster and I am the director of -- relations director of Women's Health Specialists. We are a local clinic that provides free and low cost sexual reproductive health services. I'm also here representing the North State Women's Health Network, a nonprofit organization for women that we work with and the communities that we are

PH35-01

living in.

We at Women Health Specialists and North State Women's Health network have had a longstanding relationship with the Redding Rancheria. As community partners, we support Redding Rancheria's right to conduct business in their territory and beyond. They have always contributed and provided support to the community, both people who are native an non-native.

The new expansion will only benefit the community. In fact, they have helped support Women Health Specialists when others wouldn't by sponsoring our annual events, providing grants and allowing us the ability to increase our health care access and education in Shasta County. The Redding Rancheria values the community that they are in.

PH35-01
(Cont.)

This is a demonstration to employ within and outside their community. They allow partner agencies doing the work to underserved youth to access their resources, their community room. They provide higher education opportunities for community members by providing financial support.

I can speak to this with my own experience by accessing their services when I was in need. It is because of the Redding Rancheria's support that I was able to return back to college and support the work that I do

in the community today.

They are committed to supporting this community as a whole. The Redding Rancheria is a leader in health and wellness within our community. We believe Woman's Health Specialists and North State Women's Health Network that as the indigenous people of this land, the Redding Rancheria will mitigate any concerns in the EIS. It is without a doubt that this expansion will only benefit our community. Thank you for your time.

PH35-01 (Cont.)

MR. BROUSSARD: Thank you.

Public Hearing PH36

KIRSTYN KUROKI: Good evening. My name is Kristyn Kuroki, and I am in support of the Redding Rancheria project. I want you to know that before I came to Redding, I did research on the local indigenous people because to me that meant finding out something about the community to which I've become, and I found out there was medical service for the tribal people, that there was service to the elderly.

PH36-01

I went to the tribal administration offices. I've gone through the casino. I have been impressed with the buildings and facilities. I have seen their generosity in the communities. I believe that if you give them this opportunity, they will put forth their very best efforts and they will be good stewards over the land. Thank you.

MR. BROUSSARD: Thank you.

The next three speakers will be Ken Murray, Mr. Murray will be the first speaker, and Todd Giles and Shannon Giles. I'm not sure I got that first name right. Mr. Murray.

Public Hearing PH37

KEN MURRAY: Thank you. My name is Ken Murray. I lived in the community for 50 years. I served in office here several times. Sometimes in support of the tribe, sometimes against other people they support instead of me. I have two observations I want to make, maybe three.

The first is the tribe is involved in businesses other than gaming. They are one of the largest, if not the largest, supplier of medical health services to Medi-Cal, both tribal members and non-tribal members, in the north state. They are an important part of our health care community for those that are less fortunate than others. PH37-01

The second is I hear a lot of comments of what the impact of this gaming will do, what this facility will do. Unfortunately, we kind of fail to take into effect that the NEPA document is for the purpose of describing the scope of the potential impacts. It is not a document to address the mitigation measures that will come out later. There will be other hearings.

Those mitigation measures may include no lights in the parking lot, eight lanes of freeway, three bridges.

That's on the tribe defense. It doesn't fall to local government. It's up to them to fix the mitigation measures that come about as a result of the impact of this facility.

What I lastly want to state is that as a commercial real estate broker, what has been described as highly valuable agricultural land is not commercially viable. If it were, it would be an agricultural use. It is not commercially viable for that purpose and hasn't been for years. As far as the gateway to our community is concerned, the gateway currently consists of cow pasture, a heavy equipment rental yard and a truck driving school. Thank you.

PH37-01 (Cont.)

MR. BROUSSARD: Todd Giles.

Public Hearing PH38

TODD GILES: My name is Todd Giles. Thank you for the opportunity to speak. You know, I've never been on ancestry.com or any of that kind of stuff, so I can't tell you if I have any cultural lands or where they might be. What I can tell you is I did spend a large sum of money in 1992 to purchase a home and I spent even more money in 2005 to tear most of that home down and rebuild it. I sit right next to the property. I would probably be the closest neighbor.

PH38-01

When I purchased the home, I had to clear a lot of it, I had to reclaim much of the land and I

learned -- taught myself to be a carpenter so I could fix up some cottages on the property so I could take out a second mortgage and build the home that I did build. I wasn't born with a silver spoon. I didn't move here from selling some house in the Bay Area. I did it the old fashioned way. I worked my ass off.

I'm concerned about a lot of things that were omitted from this report, specifically how the casino will be entered. There's plenty to find out how the impacts can have to Bechelli, South Bechelli, Churn Creek, but there's nothing that says how -- how do you get from Bechelli to the casino.

My house is accessed off Sunnyhill Lane, which is right below South Bonnyview which, I guess, would be considered South Bechelli. There is nothing in that report that addresses that. There's been drawings submitted to rotary clubs and various clubs in town that are not in that report. How is anybody able to make an environmental impact study without the full picture?

What is included in the report as well is the fact that surrounding homes typically have a decrease in value. That concerns me and that concerns my neighbors. There's also homes that were affected down the road, originally the River Bend Estates. They were a golf course community. The tribe bought that land and then, of

PH38-01
(Cont.)

course, it wasn't economically viable to run the golf course. They've been impacted. They'll be impacted further because they're in proximity to the casino.

I looked at your mission statement online and it says enhance the quality of life and economic opportunity and carry out the responsibility to protect and improve the trust assets of American Indians, indian tribes and Alaskan natives. That's a great purpose. Right? I think so. But I didn't find anything in your website that would say -- that would suggest or imply that those goals would be achieved by the destruction of other citizen's wealth or destroying their way of life. Thank you.

PH38-01 (Cont.)

MR. BROUSSARD: Thank you.

Public Hearing PH39

SHANNON GILES: Hi. My name is Shannon Giles. Todd is my husband. I live right next to where the proposed casino is going to be. I just wanted to add a few things. Crime really wasn't addressed in the impact report. I have personal experience with a transient that came into our house. I am terrified by the fact we're going to have that element real close.

PH39-01

I know that they've talked about they're going to have security in the parking lot and it's not going to be impacted. When there is crime, an element of crime in that area and they get kicked out, they wander into our homes. There's nothing in there that suggests that

there's going to be any help with the Redding -- Police Department response times are already bad. We already have a problem with transients by the river. That's just one of my big concerns.

Traffic, obviously, you talked about. You left out our street completely on the report. I just want to find out where exactly you're going with it. Is it going to be an overpass in front of our driveway? I don't know -- right now we can't even get two cars to go in each direction on South Bechelli. And, I guess, everything else has been addressed. I just wish you guys would consider at least our neighborhood. It's been completely left off the report. There's only six of us and I feel like the step-child there. We're concerned. We've worked hard just like you guys.

PH39-01 (Cont.)

MR. BROUSSARD: Thank you for your comment.

The next three speakers will be Gary Rickard, Terry Palazo and Carl Bott.

Public Hearing PH40

GARY RICKARD: My name is Gary Rickard. I'm vice president of the Wintu tribe in Northern California. I only got three minutes so I'm going to talk fast. I didn't get the memo that I needed notes. The Wintu people are very...(inaudible)...so we don't usually carry notes around.

PH40-01

I want to applaud the Redding Rancheria and Mr.

Potter, the honorable Mr. Potter, for their efforts in economic development. That said, the EIR report sort of indicates that Redding Rancheria tribe is the Wintu tribe. That's not true. Redding Rancheria does have Wintu people as a member of their tribe, but I can tell you that the Wintu tribe of Northern California is alive and well. We have over 550 members.

We do not oppose any economic development, but we are surely concerned about the fact that that area was village sites to our people, the Wintu people. I would like -- and I really wish Jack and the tribe would have come to us and said "How do you guys feel about that," you know. "We're a few Wintu. You guys are the majority of the Wintu. How do you feel about us building down there?"

PH40-01 (Cont.)

At this point I would like to see that more Wintu people have the opportunity to look at and comment on how they feel about this. There's a huge, huge village just below the site. Three villages on the site. Some of the last people that were there were my relatives, and they are still alive and well with their descendents.

I'm not sure that, you know, that -- how all the Wintu people would feel about this. I think they need to find that out. Thank you.

MR. BROUSSARD: Thank you.

Mr. Palazo.

Public Hearing PH41

TERRY PALAZO: Thank you for allowing me to speak. I'm the physician assistant at the Churn Creek Health Care facility. It is a 100 percent partnership facility. I came over -- I actually sought out the Redding Rancheria after several of my colleagues in the Emergency Department transferred over. The reason why is because this is an organization whose values align with myself. I'll give you a perfect example of that.

About three years ago when I transferred over, our clinic had won a contest, a Halloween dress-up contest, so they got $300. So there was a big discussion of what to do with the money, and they ended up deciding that they were going to use that money to buy Christmas trees, the permits to cut the Christmas tree for the constituents of our clinic, the patients of our clinic. PH41-01

It's a partnership clinic, so there's 20 of us. I actually went on that particular weekend because I was off and they -- or we went and cut about 20 Christmas trees. They got some additional money and they used that for the families that did not have the resources. In addition, they bought presents and that has gone on every year since.

This is not a PR ploy. This wasn't brought on by the administration of the Redding Rancheria. This was purely the people that worked there, and the reason why is

because the cultural sort of mantra of doing the right thing is huge with the Redding Rancheria.

This, real briefly, in addition I was part of the fire and we lost our home, and right from the start, the administrative powers sprang into action and brought in huge truck loads of supplies for the community, helped out financially and supplied a lot of things for the victims of that fire of which I directly was part of that. So, again, this is an organization that does the right thing. Thank you.

PH41-01 (Cont.)

MR. BROUSSARD: Thank you.

Public Hearing PH42

CARL BOTT: Good evening. My name is Carl Bott. When I finished my last tour in Iraq, I was told that Shasta County was a great place to better race my Harleys. I moved up here. Seven months later I married a lady in this town. We established a business here. I watched for 12 years this community that we love steadily decline until in the last maybe year and a half, and so now we're looking at progress started.

PH42-01

We're seeing structures downtown being built. We're seeing organizations like Costco moving out and expanding. I'm a pragmatist. That's one thing I am. I look at numbers. And I look at Win River and I see in there 700 new jobs, including $4 million in salaries. I see 2,000 construction jobs to build this facility and $99

million to build it. I see 71,000 people seen by clinics that Win River has established. I see $400,000 a year in just donations to our city and to our organizations here. I see $250,000 given so we can have another D.A. to help us with our quality of life.

It used to be we could walk along the river. People here are concerned about safety. The reason we don't have enough police and firemen is because we don't have the money. If we don't have progress, our kids are not going to stay here. They're going to go to other places to find jobs. I realize this has had an impact on people. I respect what they're saying.

PH42-01
(Cont.)

I also am looking at the future of this area. If we don't start this progress, we don't continue this progress, we're going to die on the vine here. We're just going to be a little small place in the world. People fought the Sheriton, they fought the shopping mall, they fought the car mall and they're fighting Costco and now they're fighting Win River.

I think we really need to take a look what this will do for our community and what Win River and Redding Rancheria has done for our community. I don't usually take public stances, but I think it's right this time. Thank you.

MR. BROUSSARD: Thank you.

Next three speakers will be Jake Mangus, Tricia Kaplanis and Gene Malone.

Tricia.

Public Hearing PH43

TRICIA KAPLANIS: I'm Tricia Kaplanis. I was born and raised in Shasta County, a resident from Cottonwood and I am a member of the Sioux tribe in California. In 1991 I was three years old and a ward of the court with my two sisters. The Redding Rancheria came together and fought the Courts with backing of the Indian Child and Welfare Act of 1978, and the Courts awarded over custody of me and my sisters to my aunt and uncle.

Statistically speaking, my future should have been very bleak. Fortunately, I had parents who cared enough to raise me and encourage me to continue through school and persevere. I graduated from high school as a teen mom. I received my Associates Degree with three small children at home while working nights at the casino and with the education grant to help me pay for schooling.

PH43-01

I continued on and received my Bachelor's Degree in accounting and am currently employed by the Redding Rancheria, my family's tribe. In 2016, only three months into my employment, I was experiencing a divorce. After 15 years of marriage with four kids now at home, I became an instant single mom. Unable to pay my household bills, I was being evicted, my utilities shut off and my only

transportation being repossessed. Shasta County was failing me, but Redding Rancheria did not.

They stepped up without persecution and helped me apply and receive housing in the housing program. They helped me turn my utilities on, child care with Head Start. My teenage daughter is and was able to play sports with the community fund. They provide their employees Thanksgiving dinner every year. The sharing fund helped provide for a little better Christmas for our children.

They donate to every fundraiser our children have. They pay for employees to have health and wellness with gym memberships, mud runs and give us the opportunity to participate in community activities. They provide the best health care I have experienced, all things most single moms would not be able to afford.

Redding Rancheria continues to give and give without ever asking for anything in return. I am just one of the many who receive such generosity. They are here to better the community. I support the tribe.

PH43-01 (Cont.)

MR. BROUSSARD: Thank you.

MR. BROUSSARD: Gene Malone.

Public Hearing PH44

GENE MALONE: Hi. My name is Gene Malone. A lot of people know me, I'm sure. I'm a Wintu tribal member. My grandparents were born and raised here, born on the river, up in McCloud River, and that was the inundated by

PH44-01

the waters of Shasta Lake, so they were basically removed from there.

Going back a little bit on that time, people are kind of putting tragedies out there. We come from a population of about 34,000 down to a population of about 399. That's about a 99 percent elimination of the Wintu people. Right now we're at 550 people. We know there's other people that are on the Rancheria. We just don't want to forget our ancestors. Who went through that struggle and have went on to survive and keep our counsel alive.

Win River started with a real struggle when they first started out. They started out homeless Indians. Then became a Rancheria. It was a pretty tough place to live for a long time. A lot of Wintu people struggle to have their own places to live and that can work to our detriment. It's like oh, you have your place to live. You don't need anything.

PH44-01
(Cont.)

People work hard. All of a sudden they didn't have any land. For some reason the federal government decided not to recognize the Wintu people. On that property that is Wintu aboriginal territory. There is three village sites that are known. There's one south of there that is one of the biggest archeological sites in the State of California. Along that river was some of the

most densely populated areas in the United States.

For those reasons in that site I don't feel that that should be put in that site. There's just too much impact would happen for our people that are still buried there in those areas and in those village sites that are going to get ran into. I know you might be really careful, but it's probably not going to happen. We're not going to disturb those sites. I think they should have the ability for economic development, but just not at that site.

PH44-01 (Cont.)

MR. BROUSSARD: Thank you.

The next speakers will be Debbie Hopkin, Ann Malotky and Ed Shaw.

Ms. Hopkin.

Public Hearing PH45

UNIDENTIFIED SPEAKER: She has also left.

ANN MALOTKY: I am Ann Malotky and I own a home across from the proposed casino and I also own an empty river lot across from the casino.

I'm mostly concerned about this outdoor amphitheater. Sound, as most people know, it's magnified and amplified as it crosses water. And it's because the air temperature above the water is colder than the ambient area. What that does is it creates an effect of sounds coming at you like a wall. That's why when you're on a lake or any body of water, sound is much louder.

PH45-01

So I'm really concerned about having outdoor concerts that are going to be blaring all hours of the night, I imagine, or well into the evening in the summer and what that's going to do to our little residential area across from the proposed site. I didn't really see any mitigating things that they were going to do to prevent the sound from crossing the river, so I'm really concerned about that. The only thing that I would hope is that maybe they'll do away with the amphitheater and just have it be for indoor concerts. Yeah.

And the fact that the water temperature is so cold, it's 52 degrees, for every degree centigrade the air temperature above the water drops. This is an effect in the difference in the air temperature. It's magnified even more. So I just don't see how they're going to be able to solve the problem of loud concerts coming across into the homes of the neighbors.

PH45-01 (Cont.)

So I would like to, you know, see them address that. And hopefully -- I just hope that the tribe would just stay where they are and enhance and enlarge the facility that they're in right now. I just don't understand why they want to pave paradise.

MR. BROUSSARD: Mr. Shaw.

Public Hearing PH46

ED SHAW: I came from Alaska after getting out of the Air Force in '72....(inaudible) We live on the river,

PH46-01

Riverside Drive. We strongly oppose the construction of the gaming facility by Redding Rancheria, the parcels totaling 232 acres of land in Shasta County southeast of the Sacramento River.

A significant portion of that property is subject to flooding. If efforts were taken to raise elevation in any portion of this flood plain area, construction building and parking lots will transfer flood waters to the property on the west side of the river, and it has been developed with homes for many years, placing them in jeopardy of serious flood damage and result in significant losses.

This undeveloped property is an island refuge between I-5 and the Sacramento River to wildlife, eagles, rabbit, deer, beaver, coyote and other wildlife. Any development in this area will eliminate this wonderful concentration of wildlife. The only present access to the proposed casino is from Sunnyhill Lane and South Bonnyview and a conversion of Bechelli Lane and Churn Creek Road and Interstate 5.

PH46-01
(Cont.)

This is an extremely busy area already and the future construction of Costco and Save Mor shopping center recently announced makes the future of this area a nightmare. The casino will add even more traffic to this area. In performing operation it's typical a large number

of trucks and trailers will be (inaudible) the casino. The hotel proposed would allow a large number of trucks arriving and staying the night resulting in potentially even higher sound levels at night.

Trucks that are refrigerator vans keep operating constantly with large considerable steady noise day and night. Trucks also have runoff in the parking lots which will only go into the river. When researching Indian Gaming Regulatory Act information I came across this statement S2078 (10992) Indian Gaming Regulatory Act Amendments of 2006.

PH46-01
(Cont.)

The state "Requires also that in addition to determination by the secretary, after consulting with the tribe and the standard administrative public hearing procedure, that a gaming establishment on that land would be in the best interest of the tribe and would not create significant, unmitigated impacts on the surrounding community."

The outdoor amphitheater will obviously create negative impacts on the residents in our neighborhood.

MR. BROUSSARD: The next three speakers will be Dannica Adams, Rob Lindsey and Phyllis Solberg.

Dannica Adams. Rob Lindsey.

UNIDENTIFIED SPEAKER: He's also submitting his written.

Public Hearing PH47

MR. BROUSSARD: Phyllis Solberg.

PHYLLIS SOLBERG: My name is Phyllis Solberg. I taught English for several years and I spent 20 years helping people with their personal money management. I have a quarrel with use of language here. The benefits of the casino have nothing to do with its location. It could be built on hard pan and still produce the benefits that were cited. It does not generate income. It simply transfers money out of the pockets of those who frequent the casino and the hotel. The money goes to the tribe.

Putting this land into tribal care leaves the use of that money to essentially charity rather than a vote of the people in the entire area. You spoke of stewardship of the land. The casino does not preserve the agricultural and cultural native sites, nor does it help preserve riparian habitat. PH47-01

All the stories that we've heard are wonderful, but they have nothing to do with the location of the casino and they are not an argument for locating the casino in valuable agricultural riparian land. Thank you.

MR. BROUSSARD: Thank you for your comment.

Dannica Adams.

Okay. This concludes the list of individuals who have signed up to share their comments and I thank everyone for stating their comments. We still have a

little time. If anyone else would like to make a comment, we can -- or if you'd like to add, anyone would like to add to your comments, please fill out a speaker card.

JACK POTTER: Good evening. My name is Jack Potter, Jr. I'm the tribal chairman of Redding Rancheria. I, too, am a neighbor to this development. I live right there off of .... (inaudible) My House is on the south end of the project and I will enjoy it because I can save on gas from driving clear across town. I can walk to work which therefore helps the environment.

But, also, for the record, our tribe consists of almost 400 Wintu people. Every one of our members are documented Wintu people. So I'm not sure if the size of the tribe played into this or not, but we have 400 Wintu people. Something the tribe also does from the proceeds of this is it shares with the local native community. We provide burial services, food, clothing.

So from 2012 until 2017 our tribe has helped bury 300 local native American people. So we shared the resources with the local community also by assisting with those burials, by assisting in clothing for their children at school time. We don't just keep the profits for ourselves. We give back to the community.

And we understand that traditionally this is Wintu country. We are Wintus. We cannot help the federal

government acknowledge certain groups or certain things. We use support letters from every tribe. The Wintu tribe of northern California, our tribe has support letters in support of their federal recognition. We stand on that because we were raised with traditional values to never speak against another Indian. We were raised with those values and we support their tribe. We support the other tribes trying to get federal recognition.

We have no control over the federal government and their position to acknowledge certain groups and not acknowledge them. We, too, were once terminated and didn't have status as a native, so we understand their concerns and we do support letters. We've never spoke against another tribe and their projects or anything. In fact, we share our expertise to assist the neighboring tribes.

Down the road are central Wintu people, Nomlakis. They went through a power struggle in the past and some of the young people did not know how to invest their portfolios and such. Our tribal council directed our management to go down there and to assist those people, assist them because they are our cousins. And our tribe was more than happy to do that.

I heard some Wintu concerns here tonight. I will be reaching out to them. I feel bad that their chairman

did not relay the message that I have been trying to consult with him. I found out tonight that he moved to Oregon, and so that's why he doesn't receive the messages. So it isn't that our tribe is not trying to talk with the neighboring tribes because we understand what they're going through and we would assist them.

MR. BROUSSARD: Thank you, sir.

Do we have any other from the back? Any other cards?

State your name for the record.

KIANA BENNER: My, Hi. Name is Kiana Benner. I am a member of Redding Rancheria and I am also an employee. I'm also technically like an investor for them. If it wasn't for Redding Rancheria, I personally would not be motivated to work. I've been part of it since I was 14 years old. I have worked in PR, HR, the casino itself and I currently work in ...(inaudible).

If it wasn't for them, I wouldn't be motivated to start my own business eventually. They have given me scholarships to act as a private education. I graduated with a 12th grade reading level and mathematics level. That wouldn't have happened without the scholarship program. I'm currently at Foothill and I'm going to graduate with a B average. I'm going to go to community college get my AA; transfer to the university, get my

Bachelors. And hopefully with the advancement, I've spoken to Jack Potter and other tribal council, I'm going to own my own business.

I know I'm not the only one who wants to own a business in this community because of multiple problems that need to be addressed, there are multiple medical issues in our community, the substance abuse issue, the homeless issue and a lot of that has happened with the Carr Fire. People have been displaced.

Personally I've seen the help that Redding Rancheria offered during the Carr Fire, housing, financial, there was food, there was support towards the Carr Fire for non-tribal members and employees and non-employees alike.

They have allowed children, virtually my friends, to receive scholarships to be a part of extracurricular activities in which they've excelled. I believe that the I-5 location -- I personally get phone calls from guests who refuse to come to our casino because it is about six miles away from I-5. It is not convenient for them. They're more than likely to travel 30 to 45 minutes to Corning to Rolling Hills because they are centrally located on I-5.

It is convenient for them. They allow access to big rigs. There's more rooms available. We book out

mostly every night in our hotel, mostly due to business entrepreneurs that come to town for meetings. And there are more than just the 84 rooms that we can provide. We can proved over 200 rooms that will allow more business to be generated into our community, and all around I believe it's a good investment.

MR. BROUSSARD: Write your name down so we have the spelling right.

If there are no more comments, ladies and Gentlemen, this concludes the BIA's public draft EIS hearing for the Redding Rancheria Proposed Fee to Trust and Casino Project.

I thank everyone for the participation. Good night.

(Whereupon proceedings concluded at 8:53 p.m.)

CERTIFICATE OF REPORTER

STATE OF CALIFORNIA)

COUNTY OF SHASTA)

I, JULIE A. KELSTROM, do hereby certify:

That the foregoing 99 pages constitute a true and complete transcript of the proceedings had at the time and place therein stated; that such proceedings were taken down in stenographic shorthand by me, a Certified Shorthand Reporter, at the time and place therein stated, and was thereafter reduced to typewritten form using computer-aided transcription.

I further certify that I am not of counsel or attorney for any of the parties hereto, or in any way interested in the event of this cause, and that I am not related to any of the parties hereto.

WITNESS BY HAND THIS 13th day of June, 2019

_____

JULIE A. KELSTROM, CSR #10547

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86:2
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34:6
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39:5;99:4
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21 (1)
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23 (1)
30:13
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230 (1)
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39:10
24/7 (1)
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25 (2)
59:13;64:16
250-room (1)
11:17
26-feet (1)
65:5
273 (3)
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30 (5)
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43:11;98:21
300 (1)
95:19
300,000 (1)
34:1
30-day (1)
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316 (1)
34:7
31-acre (1)
20:8
32 (1)
63:22
331 (1)
12:14
34,000 (1)
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35 (1)
20:21
37 (2)
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399 (1)
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4,000 (1)
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400,000 (1)
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56:2
52 (1)
91:12
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59:15
650 (1)
11:20
69 (1)
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70 (1)
30:7
700 (1)
85:24
71,000 (1)
86:1
72inaudible (1)
91:25
74 (1)
46:3
77.5 (1)
54:25
782 (1)
34:7

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8:00 (1)
71:6
8:53 (1)
99:15
84 (1)
99:3

9

92 (1)
12:19
99 (1)
89:6

Form Letter F1

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F1-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS. F1-02

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists. F1-03

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species. F1-04

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California. F1-05

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund." F1-06

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line. F1-07

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs. F1-08

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. F1-09

Sincerely,



Bradford Evans
20414 Gibson Ct. Redding Ca 96002

Form Letter F2

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. I highly disagree with demanding and destroying the strawberry fields to create a casino. Not only will this produce more caos and traffic, but it will also ruin natural land that should be left alone. We already have Win River nearly 20 minutes away so why do we need another one? For the future of Redding, I plead that no casino replaces beautiful strawberry fields that will lead to produce more air pollution and traffic. F2-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Audrey Locker
3434 Forest Hills Court Redding CA 96002

Form Letter F3

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F3-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



bryan doan
2169 Hacienda St Redding CA 96003

Form Letter F4

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. As a nation who honors Mother Nature, why would you desecrate this beautiful piece of land, disturb the wildlife, and riparian life along the river? In addition and the most logical and common sense reason is the roadways in that area cannot handle the increase in traffic. If you have traveled those roads during high traffic times you would know this to be true. Please consider your other locations. F4-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

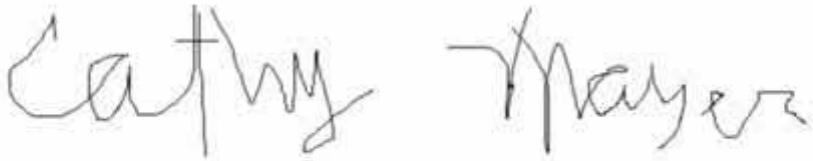
This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Cathy Mayer
1655 Bramble Pl Redding CA 96002

Form Letter F5

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F5-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Charle Hazlehurst
13663 Moonlite Lane Redding Ca 96003

Form Letter F6

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F6-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

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For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,

Charlotte Bailey

Charlotte Bailey
1429 White Water Circle Redding CA-California 96003

Form Letter F7

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F7-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Christie Bovee
1287 Nighthawk ln Redding CA 96003

Form Letter F8

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F8-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Corrie Miller
2055 Skyline Dr Redding Ca 96001

Form Letter F9

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F9-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Danny Cannon
3430 Bridger Dr Redding CA 96002

Form Letter F10

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. In addition to be below comments, there is no mention of the potential light pollution that would be caused by the parking lot lights and the lights on the Casino itself. The Casino might add money into the local economy in certain areas and that is great, but this location is not good for Redding or Shasta County. F10-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Darrel Kelley
3588 Park Dr Cottonwood CA 96022

Form Letter F11

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. I don't understand why the tribe, who call themselves keepers of the environment, would want to destroy such a beautiful setting. Many homeowners across the river will be subjected to noise, light, and vehicle pollution. Our outdoor activities will never be the same, there are other alternative site that should be considered ahead of this one. F11-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Denise Boehle
6641 Riverside Drive Redding CA 96001

Form Letter F12

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. The planning and impact evaluations for the casino project have fallen woefully short of anything approaching adequate.
I urge you to abandon this negatively impactful project, that endangers wildlife, and would certainly have a negative impact on the well-being of Redding and its citizens. Thank you. F12-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Gene Crow
1124 Burton Dr. #1 Redding CA 96003

Form Letter F13

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. The property is a beautiful riverside piece, historically agricultural. Putting this monster development on such a pristine setting is not consistent with our county's general plan and would destroy the asthetics of the neighborhood across the the river. Many neighbors, including myself and my wife, have been there for twenty to forty years. F13-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

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For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,

GREG BOEHLE

Greg Boehle
6641 Riverside Drive Redding CA 96001

Form Letter F14

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. We moved to Shasta County 13 years ago. We moved here for the nature all around Redding. Please do not move a Casino along Hwy 5 just because. Leave it where it's at. The traffic alone will ruin that area. F14-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register

the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



HEIDI PRICE
3360, Toro Way Redding CA 96002

Form Letter F15

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F15-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Jean Russell
3400Showboat CT Redding CA 96003

Form Letter F16

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. well here we go again. it seems like every 2 to 3 years someone wants to develop in the churn creek bottom area. it's an auto mall that nobody wanted or a shopping mall nobody wanted or needed. now it's a casino complex. i think it is important to keep a green open space between anderson and redding so those city's maintain there own identity and don't just bleed together like so many other California city's do. when traveling on I5 we should know where one city ends and the other begins. also the strawberry field area is some of the most fertile soil in shasta county. so we should cover that up with pavement and cement. (i don't think so) beyond the need for a green space is the wild life that lives in the area not just endangerd but life like deer wild turkeys rabbits and all sorts of other critters who will be displaced and killed in the process. also the neighbor hoods near this area are quiet single family homes what kind of disturbance will a casino and amphitheater cause in the area. our dogs will be barking constantly. our children will be kept awake on school nites will the horses and other livestock enjoy noise coming from amplifiers. every amphitheater i have been at is located away from homes and in an area surrounded by hills to keep noise from the venue to a minimum. this should be a consideration. the anderson option is a better way to go for many reasons. win river will still get the freeway frontage they want and more people will have a reason to go to anderson. let's face it all that city has is a fairground a wal-mart and a all but deserted outlets mall. if the casino is built there we keep the green space between and maybe buisness's in anderson will have a better chance to grow and thrive. right now there is really no reason for anyone to stop in that town at all. i understand all the good things the rancheria doe's for the community and they should be able to grow and continue there good deed's but casino's bring other bad things to there area as well. if this is allowed to happen what will that do to property value's will anyone want to buy homes in the area. it will probably limit buyers to only people that like going to casino's. so all of us home owners will be stuck with un-sellable property. the bottom line is that the strawberry fields area is a bad location for a development on this scale and there should be a zone of no development at all between riverbend rd and south bonneyview rd. if this ends up being put to a county wide vote i am sure more folks will want to leave churn creek bottom alone and the way it is than will want a huge casino complex as the entrance to Redding.

F16-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the

world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



joe vanenkenvort
19178 gravel plant rd redding ca 96002

Form Letter F17

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F17-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Kathryn Patterson
1283 Denton Way Redding California 96002

Form Letter F18

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. Redding is suffering from a plethora of problems that need to be addressed before we invite more criminal enterprise to the area. It is well known that the casino where it currently sits has constant police presence. Moving to a larger location will only invite more trouble. We are not prepared for this as our law enforcement community is understaffed and our jail is overfull. F18-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

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This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Kayla Brown
1095 Hilltop Dr #275 Redding CA 96003

Form Letter F19

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F19-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

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This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Leann Owens
1645 Sonoma St Redding California 96001

Form Letter F20

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. You should have put this out on "Nextdoor". I have copied and pasted some of it to notify a larger group of people. F20-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to

Shasta County and the City of Redding.

Sincerely,

Marsha Nelson
3764 Eagle Parkway Redding CA 96001

Form Letter F21

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F21-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Nancy Edmonds
19880 Dairyland Dr. Redding Ca 96002

Form Letter F22

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F22-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

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This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Patricia Soileau
1970 Trumpet Dr Redding CA 96003

Form Letter F23

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F23-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Patrick Crowley
2032 Oconner Ave REDDING CA 96001

Form Letter F24

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F24-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

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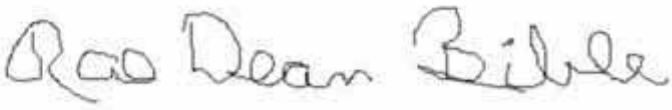
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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Rae Dean Bible
3170 Sacramento Dr Redding CA 96001

Form Letter F25

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. I'm opposed to another casino being built in this community. The additional problems of crime, traffic, encroachment onto natural resource land and potential gambling related addiction for our area. I think we have enough with the current casino. No more problems. It's not worth it for Redding or Shasta County. It brings down the beauty and value of our community. F25-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Reagan Locker
3434 Forest Hills Court Redding CA 96002

Form Letter F26

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. This project is simply due to pure greed. This tribe already has a new, modern casino in Redding. It is a small tribe with relatively few members. The current casino gives them a luxurious lifestyle already. There is simply no justification for building this giant traffic jam in that area and cheating the existing Redding businesses out of a living. It will take away from the tax base available to Redding as well as killing many of the current lodging and entertainment businesses. F26-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

Form Letter F26

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Richard Johnson
1101 De Moll dr Redding CA 96002

Form Letter F27

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F27-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



robert smart
7068 riata dr. redding ca 96002

Form Letter F28

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. I take great pride in our city's appearance. I do not want Redding to become another metropolitan area. That is why I am opposing the commercialization of the agricultural land leading north on I5 up to our city's beautiful naturally forested entrance at Bonnyview. I don't want to be greeted home by tall manmade structures, traffic congestion, and more crime. I think that with the prospect of global warming that our representatives and tribal members should encourage agriculture (possibly an orchard) not energy polluting congestion and sprawl. F28-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further

without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Shirley Goldstein
947 Bahama Ct. Redding CA 96003

Form Letter F29

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. The whole idea of relocating the casino saddens me greatly. My family and I enjoy the natural surroundings that Redding has to offer. The new location would have a terrible impact on our lives and the wildlife that already inhabit the area. Please reconsider. F29-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register

the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Susan Crowley
2032 Oconner Ave REDDING CA 96001

Form Letter F30

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F30-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

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For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Terry Cowan
20450 Concerto Ct. Cottonwood California 96022

Form Letter F31

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. My husband and I travel over Bonnyview Rd. everyday and over !5. There is no way there can be a flow pattern with Costco going in and Traffic for I5. We live off Girvan Rd. and this traffic problem will spill over to many neighborhoods. Look at all the vagrants that already congregate behind Win River. It will be unrealistic, F31-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

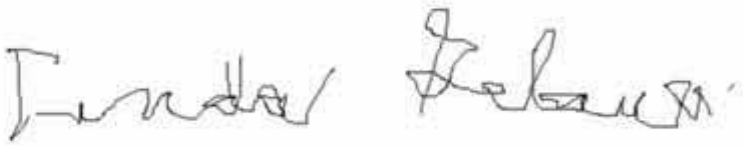
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Sincerely,



Linda Gebauer
Riverside Dr. Redding Cal. 96001

Form Letter F32

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. 5477 Willow Road

F32-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Sarah Wickenheiser
5477 Willow Road Redding CA 96001

Form Letter F33

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F33-01

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The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

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This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Tami Dwinell-Nisbet
6632 Stoney Dr. Redding Ca 96002

Form Letter F34

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. The main concern I have is due to the traffic. When I take my son to school in the mornings traffic is already backed up and it is almost impossible to get on I-5. I feel that the Rancheria should have to put in their own over pass in order to cut down on the congestion on South Bonnyview. F34-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register

the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Van Williams
3347 Glenrock Way Redding California 96001

Form Letter F35

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. The infrastructure of the proposed casino off of I-5 would create major problems to the environment. With its own sanitation facilities, amphitheater, and additional traffic, the quality of land would be devalued, wildlife and residents would be adversely affected by noise and lights, and the load of traffic would be congested. The homeless community would also increase in this area as it has on Hwy273. The main concern for this location is that it provides habitat for several species within the city of Redding, which is vital to keeping this area diverse and rural. Without this habitat, much of our wildlife would be reduced to scattered population among the outlying hills, and would decrease fish reproduction. Natural water flow is very important in this region for maintaining fish and wildlife populations, as was native vegetation. This would be greatly disrupted by infrastructure. Further studies need to be conducted to measure the impact on the wildlife, both flora and fauna, as well as water flow, soil fauna, and the amount of loss compared with another site or leaving the casino in its current location. There are several other options for creating jobs and increasing revenue, such as another location, management of the proposed site for natural ecosystem purposes, or additional outreach programs. The Bonneyview site is not the site for such massive infrastructure and traffic.

F35-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Mikayla Loucks
3650 Geyser Way Anderson CA 96007

Form Letter F36

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. The esthetics of having a casino as a welcome to our community is not one that I would personally like to see on my way into town everyday or on my way home for that matter. Everyone that comes into town to visit from other places always say how pretty it is around Redding. I would hate to hear "oh you live up in Redding with that casino as an eyesore. We don't live in Nevada where Gaming is what its known for. Lets not make California be known for it as well. The casino is fine where it is. They make enough money and have a big enough casino as it is. I haven't been in there in years and that's because its not a pleasant place to be. People want to open up new businesses lets do something with the empty retail spaces that we currently have throughout the city.
Thanks. F36-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding

businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Kile McClure
7037 Granada Dr. Redding CA 96002

Form Letter F37

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F37-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



fran mazet
1283 river ridge dr redding ca 96003

Form Letter F38

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I live across the Sacramento River from the proposed casino. I'm concerned about noise polution from the amphitheater. also, why can't the casino stay where it is and expand up clear creek. the rancheria should use the beautiful strawberry fields as a ranch or farm land. South Bonnieview can't take any more traffic. i say no to costco and the casino
; both should stay where they are. thank you. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F38-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with

the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



george boreham
6456 Creekside St Redding CA 96001-5837

Form Letter F39

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I've been a resident of Redding since the late 70's. My wife and I own several acres in the beautiful Churn Creek Bottom area. I love northern Calif and it's beauty which is the primary reason for my concern. I love the Indigenous people and have nothing against them. If they love the land like they say they do then why would they want to place an ugly, monstrous building complex at the entrance to Redding next to the beautiful Sacramento River? Their only focus and motivation is money. This complex would compromise the wildlife, ruin the natural beauty, cause traffic congestion, add polution from the parking areas with water runoff from oil and other chemicals from vehicles, inebriated drivers, add the risk of sewage contamination to mention just a few concerns. This complex belongs in an area like where the current Casino is located. An expansion of the current Casino would be a much better option. This project would not bring tax revenue into the city, contrary to what many believe. Many projects similar to this are stopped in their footprints through legal action based on environmental impacts to certain species of animal and insect life. Unfortunately, this doesn't seem to be happening in this case, perhaps due to lack of funds to fight this project? This project simply needs to be averted ASAP! Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F39-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Glen Harmer
7333 Waterside Way Redding CA 96002

Form Letter F40

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

A man has as many masters as he has vices. Promoting vice will hurt Shasta County residents. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F40-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

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Sincerely,



Gordon Woodman
2740 Ganyon dr. Anderson CA 96007

Form Letter F41

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F41-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Joan Gillette
22164 University Ave Palo Cedro CA 96073

Form Letter F42

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F42-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Joslyn Mitchell
3202 Atletas Way Redding CA 96002

Form Letter F43

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I have been a resident of Redding for 62 years. I do not feel a casino located at the southern entrance to our beautiful city is the appropriate reception for visitors to our area. It would be better suited elsewhere! Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F43-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

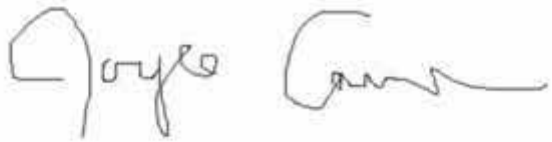
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This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Joyce Cannon
3430 Bridger Drive Redding CA 96002

Form Letter F44

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F44-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Lance Smith
2941 Lowden ln Redding Ca 96002

Form Letter F45

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Revised 8/13/19

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. I have enjoyed visiting Win River Casino in Redding many times at its current location off of Highway 273. In addition, I have visited many other Indian casinos throughout the state of California. I appreciate the many charitable things the casino has done for our community. F45-01

It is not the proposed casino that I object to, but the location of it. I love living in Redding and appreciate the natural beauty which abounds in our area. Each time I return to Redding on I-5, I wonder at the majesty of Mt. Shasta and Mt. Lassen. I enjoy the peaceful farmlands of the Churn Creek bottom. It is this quiet natural beauty which attracted me, as it has many visitors to our city. I appeal to you, Native Americans, lovers of nature, to consider the impact this location would have. Please do not allow blaring lights, tour buses, and swarms of cars to replace our natural environment as the gateway to the North State.

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Marilyn Selke
15667 Sol Semete Trail Redding CA 96001

Form Letter F46

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F46-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Michael Mitchell
3202 Atletas Way Redding CA 96002

Form Letter F47

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

There seems to be no consideration on the part of Win River as to how this will affect the surrounding homeowners, freeway and the city of
Redding. We oppose the location of this casino. We enjoy the bucolic setting that this casino will destroy. They say it is for the acquisition
of more tribal land, but lets be honest. It's about the money.
.
They say it is Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F47-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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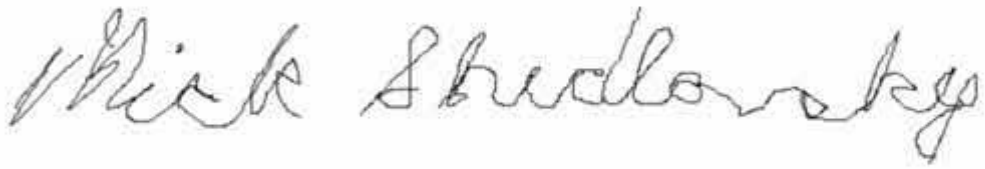
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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

Form Letter F47

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Nick & Jackie Shidlovsky
3599 park dr. cottonwood California 96022

Form Letter F48

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Do not pave over more open land for a neeer larger casino. Let the casino expand from where it is now. They can grow in their current location unhindered. I am a lifelong resident and this particular change is unwarranted. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F48-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,

Penny Woodmansee
2110 Vallecito Ct Shasta Lake CA 96019

Form Letter F49

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am writing to express my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. I am a long time resident in this area. We moved hear because we liked the family oriented atmosphere. Gambling is not family oriented. It causes divisions in families and childen are affected adversely. We don't want to be known as the town with the big casino by the freeway. F49-01

As stated by the DEIS, this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. Critically, the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a faulty portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

For the reasons outlined above, I wish to lodge my opposition to the project on the Strawberry Fields site and register

the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding.

Sincerely,



Phyllis Schwerin
6580 Mossom Ln Anderson Ca 96007

Form Letter F50

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

If I had a heading for this project it would be, "Too close to home!" It's just too close to subdivisions and an already congested area of traffic. Another heading could be, "What can you be thinking!?!" But I already know the answer to that: you are thinking only of yourselves and what a pretty setting it will be. Please rethink this area for building. Please. Keep it residential, Redding! Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F50-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of

Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Robbin Borden
6726 Riverside Dr Redding California - CA 96001-5431

Form Letter F51

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F51-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Stan Bridges
15400 Horizon Hills Dr. Redding Ca. 96001

Form Letter F52

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I worked for the Department of the Interior for almost 31 years. I know that you have a difficult job but I think the best approach is to kill this project. I would think that the Rancherias would want to protect land close to the Sacramento River. Please chose the no action alternative. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F52-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Steven Anderson
11701 Wilvern Ln Redding Californian 96003

Form Letter F53

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

We think that the proposed casino would be a bad first impression on visitors coming from the south on Hwy. 5, and overwhelm the local area with extra traffic. The shops and hotel would take business away from our downtown, the mall, and also our new Sheraton by the Sundial bridge. We live in that area and want the green space to remain there for wildlife and birds that are local to that area.Brent Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F53-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of

Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,

Brent V Collins, Marsha Collins

Brent Collins
4809 Alta Mesa Dr. Redding CA 96002

Form Letter F54

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F54-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

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I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Brian Rice
5791 Farm House Lane Redding CA 96001

Form Letter F55

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I live near churn Creek and South bonnyview drive for 15 tested now. The new shopping center on churn Creek road if going to increase traffic enough. I can't image how terrible it will be with this huge casino adding thousands of cars to the roads also. The on on-ramps and off-ramps are already backed up at I-5 and South bonnyview. There is not enough road for the amount of traffic that will be put in our neighborhoods. To much development on one freeway intersection. I don't want the first business you see entering our beautiful town to be a gambling casino. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F55-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

Form Letter F55

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Brian White
1346 Denton Way Redding CA 96002

Form Letter F56

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Step back, look around, and think for a second. We need to help OUR YOUTH, NOT ENABLE MORE PEOPLE WITH ADDICTIONS. Boys and girls club is greatly needed!!!! Help kids have support to become more than a person of addiction in SHASTA COUNTY!!!!!! PLEASE!!!! Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F56-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Crystal Wadzeck
19509 Jacqueline st B Anderson Ca 96007

Form Letter F57

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I have lived in Redding and Shasta County for most of my life and have seen the growth and changes, some good - some bad. This development is one of the major "bad" issues we face. The beauty of the present land is a good representation of our area and a commercial development of a casino will cheaper the area.
I have seen other casinos along major roads and freeway throughout California and Oregon, not pleasant at all.

Please be responsible and save the natural beauty of the place I call home. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment.

F57-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

Form Letter F57

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Diana Gifford-Tuggle
1818 Marlene Ave Redding CA 96002

Form Letter F58

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Building another hotel in Redding isn't want this town needs. I work in a hotel, and keeping them full every night just doesn't happen. The letter that has been drafted also speaks for a number of reason this casino shouldn't be build. There is so many other ways to use the land, that doesn't hurt the environmental. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F58-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of

Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Jan Clark
2885 red bud lane anderson California 96007

Form Letter F59

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

In my opinion, judging from the artist sketh of the future casino. it is a complete eye sore. It's too Las Vegasis and sure will not lend itself to the surroundings. You want something that will blend in, not jump out at you. Rolling Hills is right on the freeway, but it blends in with the area around. This place looks like it should be on the strip not in little old Redding. What is wrong with the present casino. It was is newly remodeled and is pretty nice. Another bone of contention is the traffic. Costco I think, should lookd for a place in Anderson where there is lots of open space. The traffic on I5 will be horrible if both places are built, not to mention the other intended shopping center across the freeway. I5 and Bonnyview It will be a total nightmare. I live in Cottonwood so it wouldn't affect me except when I come to Redding which is about 3 or 4 times a week. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F59-01

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without a genuine assessment of impacts to the local economy beyond short term construction jobs.

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Sincerely,

Jan Garner
20520 Linda Lane Cottonwood Ca 96022

Form Letter F60

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

As a long time resident I do not want to see big time casinos here. It destroys the smaller community feeling I moved to Redding for. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F60-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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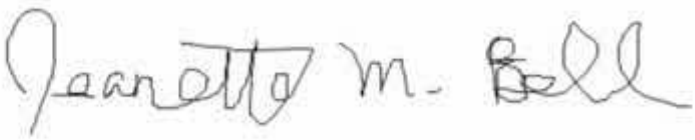
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Sincerely,



Jeanette M Bell
429 Moonstone Way Redding CA 96003

Form Letter F61

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I do not want this bigger casino in my town..a waste of good land. Don't want more of what it will attract to this town..of the traffic. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F61-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Jen Skelton
675 rogue River way Reddding Ca 96003

Form Letter F62

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Thank You for taking the time to read our letters. I pray that you will understand how important to our community it is that this project does not go through. One of the things that has drawn people to the area is a desire to escape the traps and chaos of the big city. We want our children and grandchildren to grow up without the corruption of such places. Building this complex will simply destroy the already fleeting peace we have. We are a community that has very low wage and fight to keep prices down. But Big casino's steal from those who need it the most. Gambling is an addiction and it is harmful not only to the gambler but also to their families. Also the area they want to build in is a rural farm land area. People that bought out there did so for the purpose of having some privacy and separation from city life and traffic. Please stop this project before it destroys peoples lives and the environment we live in. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F62-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Jonni-Lynn Malley
852 Partridge Dr. Redding California 96003

Form Letter F63

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F63-01

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Sincerely,



Kristi Schafer
P.O. Box 1048 Bella Vista Ca 96008

Form Letter F64

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Another casino will bring more crime to a predominately residential area. It will also destroy a beautiful habitat for animals and beauty. The Rancheria ought to build a school or mental health institution instead of another casino. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F64-01

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Sincerely,



Melody Fowler
6527 Clear View Drive Amderson CA 96007

Form Letter F65

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Our family moved to Redding over fifty years ago from the greater Los Angeles area because we had visited Shasta Lake and the Redding area and were attracted to the natural beauty and resources here. We have lived in Churn Creek bottom and seen the traffic at the Bonneyview interchange become a logjam many times of each day. Since we and our neighbors use this intersection regularly, our experience tells us that the DEIS does not show adequate estimates of traffic there nor does it show adequate mitigation. The potential for ruining the rich aesthetic value of this entry corridor to Redding, not to mention the the destruction of rich natural again resources is an example of poor planning. The proposed project is not only inconsistent with the county's and city's plans, it will serve to promote inappropriate commercial sprawl and detract from existing Redding commerce. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F65-01

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The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Phyllis Lawler
7009 Churn Creek Road Redding CA 96002

Form Letter F66

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F66-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Ross Jones
23457Cassel Fall River Rd Fall River Mills California 96028

Form Letter F67

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I came here in 2012 and appreciate much about Redding and its surroundings. The farms, horses, orchards etc. contribute so much to the atmosphere. I saw the fortitude of the population when the fire came. We had to evacuate but in the end had no losses.. I found the people of Redding to be friendly and open. The town has some charm. I had lived for several seasons of my life in Oroville and there I saw the degradation of the town that occurred when two casinos were built there, just a few miles apart. Like Redding, Oroville had some beautiful surroundings and some local charm. After the casinos were built the downtown of Oroville began to decay and continued its downward slide when Walmart was built and the nice little downtown decayed, the locally owned shops lost their customers and the poor part of town has turned into a disgusting slum. I will be deeply saddened if another Casino is built here. One is enough trouble for a town to bear. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F67-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Willene v. L. Pursell, Ph. D.
3182 Pinot Path Redding CA 96001

Form Letter F68

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I work hard to help Redding become a better place for my family and others to thrive. Bring business to this community is important. I want business that is healthy for our community not one that supports the deterioration of the family like gambling with it's attached parasites like prostitution and addiction. Business yes but NO to a casino!! Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F68-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Monty Apple
695 Saint Thomas Pkwy Redding CA 96003

Form Letter F69

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I grew up in Oroville, CA and it was never a perfect place but I have seen how the influence of the casinos that were built there in the 90s have had a very detrimental effect on the community. They attract drugs and prostitution and they prey on the poor who will spend their welfare check trying to hit it big with gambling. Unfortunately we already have a casino here in the Redding area and the last thing we need is another. The dramatic added increase in unnecessary traffic coming off of 1-5 would be disastrous. Another casino is a horrible idea for this community and anyone with a good sense of morality will object to it. We do not want to be like Oroville. Our Native American neighbors in this area are beautiful, talented, creative people who are more than capable of improving their economic status without using a means like a casino to do it. This project would be damaging to them in the long run no matter what the so called studies may predict. It is not good for the long term health of their community to seek to improve their economic status through an immoral and destructive means like a casino. In fact they will do better in the long run to do it in other ways where their brilliance and creativity as a people is called upon and released. May Almighty God(Grandfather) bless our Native American neighbors and provide them a better way to help themselves economically. May God bless all of Redding and its people. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F69-01

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Sincerely,



Stephen Pursell
3182 Pinot Path Redding CA 96001

Form Letter F70

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Win River Casino Complex
Redding, CA

When Win River opened their current location on Hwy 273, they lit up the sky with a giant spotlight that reached out and grabbed our visual attention from locales all over Shasta County. This went on for, I would guess, at least year (though it seemed so much longer!), making it impossible for folks like me to sit out in the evening just to enjoy the night sky, let alone find the Milky Way. The visual distraction was a most unwelcome interference of our peaceful evenings.
The artist's rendition of the proposed complex promises to ruin the rural agricultural landscape while at the same time killing the prime ag soil beneath, making it impossible to ever reclaim.
With this massive (230 acres!) complex in place and visible from all over the County, I-5 and Redding will begin to resemble Las Vegas and Henderson NV, the antithesis of our rural Shasta County lifestyle.
Light pollution will increase exponentially and, along with the unavoidable noise pollution, will degrade the quality of life of residents for many miles around, including their property values.
We also need to consider all the other lives within the riparian habitat along the Sacramento River, which the proposed Win River complex would claim. There is no way to justify the loss by death and displacement of so much wildlife.
The two new already approved shopping centers going in at the nearest I-5 exit 675, just up the hill, will already cause tremendous traffic congestion for which we have yet to see a workable resolution. (Much as I like traffic circles, I don't see them as able to handle a problem this labyrinthine.) With the addition of thousands more vehicles going to and from the casino complex, I can see nothing but gridlock at all entrances and exits. Those of us who regularly use this intersection daily will likely have to reroute to Cypress Street in Redding or detour through Anderson. Neither of these options is reasonable.
I attended the BIA hearing in Redding on May 20. I listened to every single comment from those for and opposed to relocating and expanding the Win River Casino to I-5 and South Bonnyview location.
I don't think anyone can argue that the Win River organization hasn't contributed mightily to the community that includes Shasta County and the cities, towns, and organizations within its borders.
However, for all of the reasons I have cited above, I do object to the proposed project at the proposed location. Please do not approve the Fee to Trust for this property. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment.

F70-01

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Sincerely,



Tammy Cole
6043 Oak Street Anderson CA 96007

Form Letter F71

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am concerned about this project progressing forward. My concerns are cumulative in that the impact of increased traffic at the Bonnyview Exit, the flood issues and impact to the environment. As I understand this land was supposed to remain as farmland. Constructing a new casino would increase crime of which I am not in favor of. I also understand that this casino would not be contributing to the community as a whole in that taxes are exempt for this project. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F71-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Brenda Wilson
15956 Cloverlorrie Lane Anderson CA 96007

Form Letter F72

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I moved to this area years ago from Los Angeles, to be part of a different ecosystem, away from all that this project brings with it, including the traffic, noise, crime, and destruction of wetlands and wildlife. We don't want the area businesses to be hurt by the unfair competition this project brings, or the landscape to be altered by billboards and electronic signs, or the neighborhoods to be filled with the cumulative noise. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F72-01

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I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with

the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Janet Londagin
20839 Antlers Rd Lakehead CA 96051

Form Letter F73

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

When the casino issue came up for vote in California and other states, they assured us the location could only be on "reservation/rancheria" land. This was perpetrated on a false pretense. We were never told "any" property they purchased would be considered tribal land and eligible for gaming. I totally oppose this casino relocation. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F73-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

This project calls for new businesses beyond the casino that will directly compete with and hurt local Redding businesses, directly citing one business that would take a 24% hit to its bottom line.

The proposed development is inconsistent with the County's designation and zoning of the site for Agriculture. It is inconsistent with the City's plan for growth as it is not identified as a primary or secondary growth area within the General Plan. I oppose transforming Strawberry Fields from rural, undeveloped greenspace and thus permanently altering the landscape and gateway to our community. The proposed 9-story hotel is substantially taller than any other existing, approved, or proposed building adjacent to I-5 within the City of Redding. Graphic renderings of the project appear to show electronic signs or billboards, which are banned in the City of Redding. Overall the project is out of character with our community and the DEIS improperly minimizes the aesthetic impacts for residents and tourists.

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The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of

Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Jean Murillo
344 Weldon St Redding CA 96001

Form Letter F74

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F74-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Joyce Hankin
4128 Sheryl dr Redding Ca 96002

Form Letter F75

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

Please stop expansions. It is ruining our rural area. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F75-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,



Julia Screechfield
3310 sioux Dr shasta lake CA 96019

Form Letter F76

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I am a concerned mom of 6. The extra traffic on S. Bonnyview due to the proposed casino and hotel, would not only be disruption to our neighborhoods and families, but would also bring increased driving risks to our teen and new drivers. Furthermore, the destruction of over 230 acres of "The Strawberry Fields" for the purpose of a casino is absolutely unthinkable. Our family appreciates nature and preserving habitats for endangered animals. In addition, amphitheaters are loud and also cause disruption in neighborhoods where families are aiming to live quiet and peaceful lives. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F76-01

The published DEIS says this casino "would generate a significant increase in traffic", more than 13,500 new vehicle trips per day. But the traffic analysis completely ignores impacts to typical weekday rush hour traffic. This is a false portrayal of how a substantial development, potentially including retail and entertainment venues, will impact the day-to-day lives of neighbors and commuters. The DEIS and accompanying traffic report must be revised and recirculated prior to issuing a Final EIS.

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Sincerely,

Leslie Eddleman

Leslie Eddleman
8620 Redbank Rd Redding CA 96001-5534

Form Letter F77

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

I live within one mile of the proposed new casino site and feel it will have a cumulative effect on crime and impaired drivers that will impact the area in a bad way. I also worry about the transients who will follow the casino to it's new location, camp in the green belt along the Sacramento River and potentially start a fire that will be uncontrollable up and down the river depending on which direction the wind is blowing. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F77-01

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the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,

Nick GARDNER

nick gardner
328 wilshire drive redding california 96002

Form Letter F78

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

My name is Norman Brewer. I have many friends and some family living in the Redding area. I have long supported American-Indian-nations sovereignty *on tribal lands*. However, this proposed casino project is corrupt in every aspect:

#1. Gambling is a negative *vice* that destroys the lives of those many people whom are susceptible to addiction either because of economic desperation or addictive personality. These Addicts Must Serve Their Addiction! They will destroy themselves, their family, friends, and other vulnerable persons.

#2. Very large casinos attract criminals whom bring other vices into the local area, e.g. robbers, con artists, prostitutes, pimps. Crime is 30% higher in Las Vegas than the national average for cities.

#3. The proposal cedes sovereign Redding territory strategically near the heart of downtown to an entirely different American Indian legal *tribal* jurisdiction that has *zero accountability* to Redding citizens. When *inevitable disputes* arise over noise, street crime, pollution in the Sacramento River, etc. It will need to be determined whether legal recourse can be sought in a Redding court *or* justice must be sought in a *tribal council* that is *NOT* a jury of your peers and is *NOT* from your community!

F78-01

#4. The *casino's* shops, restaurants, salons, and hotel *unfairly* compete with local business which must pay property taxes and sales taxes to support schools and emergency services, and must abide by state, county, and city laws.

Any cadre of persons seeking to establish a corrupt *cartel* that produces and sells a negative destructive vice such as drug dealing, human trafficking, pimping, or gambling are *sociopaths* lacking empathy for fellow human beings. Instead, please consider selling a positive product, on a level playing field, that actually benefits people over the long run. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment.

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Sincerely,



norman brewer
2235 stratford ave redding ca 96001

Form Letter F79

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

In my opinion this project that Win-River is planning for Strawberry Fields Casino would have a huge negative impact on the City of Redding due to tax loss, business loss and employment loss. This project should not be allowed to go forward. Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F79-01

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Sincerely,



Richard Fyten
2379 Cumberland Drive Redding CA 96001

Form Letter F80

Amy Dutschke and Chad Broussard

Regional Director, Bureau of Indian Affairs, Pacific Region,

2800 Cottage Way, Sacramento, California 95825

Ms. Dutschke and Mr. Broussard,

745 Shasta Park Drive Please accept this letter expressing my objections to the Redding Rancheria's proposed casino and hotel complex on the "Strawberry Fields" site, as outlined in the Draft Environmental Impact Statement (DEIS). This project will significantly and permanently alter our community and the DEIS does not adequately address several issues or fully describe impacts to our local economy, infrastructure and environment. F80-01

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The Sacramento River adjacent to Strawberry Fields is essential to the survival of Salmon and Steelhead, is listed as critical habitat and is vital to their existence. The DEIS claims impacts are minimal or can be mitigated, but does not address the noise and light issues which will dramatically impact these endangered species. Additionally, the measures proposed to mitigate erosion, runoff and flood related impacts to the river are poorly described in the DEIS and do not convincingly describe how the river and project site itself will be protected. People come from around the world to fish the Sacramento River, and this project endangers its fish and numerous other threatened and endangered species.

Numerous other plants and animals, some state or federally listed as threatened or endangered, are listed in the DEIS as present or nearby the Strawberry Fields site. Bald Eagles were observed there. This is the symbol of our nation, and is endangered in California.

This project plan calls for an outdoor amphitheater, but gives no information as to where it will be located, when or how it will be used. Amphitheaters are loud, and this project is near neighborhoods with families and senior citizens. The DEIS claims no significant noise impacts from this project, but neglects to address the amphitheater proposal? The DEIS also minimizes the direct competition of the Amphitheater to the Redding Civic Auditorium. The City of Redding has said "Adding two venues of similar size will certainly lead to competition between the venues and could cause the Civic Auditorium to once again become a burden on the General Fund."

The DEIS review of economic impacts is manifestly flawed and inadequate, and this project should not proceed further without a genuine assessment of impacts to the local economy beyond short term construction jobs.

I wish to lodge my opposition to the project on the Strawberry Fields site and register the above mentioned flaws with the DEIS, which is an incomplete and inadequate review of the casino's impacts to Shasta County and the City of Redding. I also wish to incorporate by reference the comments of the Speak Up Shasta Association.

Sincerely,



Shaun Vega Sanchez
745 Shasta Park Drive Shasta Lake CA 96019

DRAFT EIS NOTICE OF AVAILABILITY

FEDERAL REGISTER

Department's leasing regulations apply equally to improvements, leaseholds, and activities on land leased pursuant to Tribal leasing regulations approved under the HEARTH Act. Congress's overarching intent was to ''allow Tribes to exercise greater control over their own land, support self-determination, and eliminate bureaucratic delays that stand in the way of homeownership and economic development in Tribal communities.'' 158 Cong. Rec. H. 2682 (May 15, 2012). The HEARTH Act was intended to afford Tribes ''flexibility to adapt lease terms to suit [their] business and cultural needs'' and to ''enable [Tribes] to approve leases quickly and efficiently.'' *Id.* at 5–6.

Assessment of State and local taxes would obstruct these express Federal policies supporting Tribal economic development and self-determination, and also threaten substantial Tribal interests in effective Tribal government, economic self-sufficiency, and territorial autonomy. *See Michigan* v. *Bay Mills Indian Community,* 134 S. Ct. 2024, 2043 (2014) (Sotomayor, J., concurring) (determining that ''[a] key goal of the Federal Government is to render Tribes more self-sufficient, and better positioned to fund their own sovereign functions, rather than relying on Federal funding''). The additional costs of State and local taxation have a chilling effect on potential lessees, as well as on a Tribe that, as a result, might refrain from exercising its own sovereign right to impose a Tribal tax to support its infrastructure needs. *See id.* at 2043–44 (finding that State and local taxes greatly discourage Tribes from raising tax revenue from the same sources because the imposition of double taxation would impede Tribal economic growth).

Similar to BIA's surface leasing regulations, Tribal regulations under the HEARTH Act pervasively cover all aspects of leasing. *See* 25 U.S.C. 415(h)(3)(B)(i) (requiring Tribal regulations be consistent with BIA surface leasing regulations). Furthermore, the Federal government remains involved in the Tribal land leasing process by approving the Tribal leasing regulations in the first instance and providing technical assistance, upon request by a Tribe, for the development of an environmental review process. The Secretary also retains authority to take any necessary actions to remedy violations of a lease or of the Tribal regulations, including terminating the lease or rescinding approval of the Tribal regulations and reassuming lease approval responsibilities. Moreover, the Secretary continues to review, approve, and monitor individual Indian land leases and other types of leases not covered under the Tribal regulations according to the part 162 regulations.

Accordingly, the Federal and Tribal interests weigh heavily in favor of preemption of State and local taxes on lease-related activities and interests, regardless of whether the lease is governed by Tribal leasing regulations or part 162. Improvements, activities, and leasehold or possessory interests may be subject to taxation by the Mississippi Band of Choctaw Indians.

Dated: March 5, 2019.

Tara Sweeney,

Assistant Secretary—Indian Affairs.

[FR Doc. 2019–07092 Filed 4–9–19; 8:45 am]

BILLING CODE 4337–15–P

DEPARTMENT OF THE INTERIOR

Bureau of Indian Affairs

[192D0102DR/DS5A300000/DR.5A311.IA000118]

Draft Environmental Impact Statement for the Proposed Redding Rancheria Fee-to-Trust and Casino Project, Shasta County, California

AGENCY: Bureau of Indian Affairs, Interior.

ACTION: Notice of availability.

SUMMARY: This notice advises the public that the Bureau of Indian Affairs (BIA), as lead agency, intends to file a Draft Environmental Impact Statement (DEIS) with the U.S. Environmental Protection Agency (EPA) in connection with the Redding Rancheria's (Tribe) application requesting that the United States acquire approximately 232 acres of land in trust in Shasta County, California, for the construction and operation of a casino resort.

DATES: Written comments on the DEIS must arrive within 45 days after EPA publishes its Notice of Availability in the **Federal Register**. The date and location of the public hearing on the DEIS will be announced at least 15 days in advance through a notice to be published in local newspapers (Redding Record Searchlight and Sacramento Bee) and online at *http://www.reddingeis.com.*

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

FOR FURTHER INFORMATION CONTACT: Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, Pacific Regional Office, 2800 Cottage Way, Room W–2820, Sacramento, California 95825; telephone: (916) 978–6165; email: *chad.broussard@bia.gov.* Information is also available online at *http://www.reddingeis.com.*

SUPPLEMENTARY INFORMATION: The Tribe submitted an application to the Department of the Interior (Department) requesting the placement of approximately 232 acres of fee land in trust by the United States upon which the Tribe would construct a casino resort. The facility would include an approximately 69,500 square foot casino, an approximately 250-room hotel, an event/convention center, an outdoor amphitheatre, a retail center, and associated parking and infrastructure. The new facility would replace the Tribe's existing casino, and the existing casino buildings would be converted to a different Tribal use.

Accordingly, the proposed action for the Department is the acquisition requested by the Tribe. The proposed fee-to-trust property is located in an unincorporated part of Shasta County, California, approximately 1.6 miles northeast of the existing Redding Rancheria, and about two miles southeast of downtown Redding. The proposed trust property includes seven parcels, bound by Bechelli Lane on the north, private properties to the south, the Sacramento River on the west, and Interstate 5 on the east. The Shasta County Assessor's parcel numbers (APNs) for the property are 055–010–011, 055–010–012, 055–010–014, 055–010–015, 055–050–001, 055–020–004 and 055–020–005.

The following alternatives are considered in the DEIS: (1) Proposed Project; (2) Proposed Project with No Retail Alternative; (3) Reduce Intensity Alternative; (4) Non-Gaming Alternative; (5) Anderson Site Alternative; (6) Expansion of Existing Casino Alternative; and (7) No Action Alternative. Environmental issues addressed in the EIS include land resources; water resources; air quality; noise; biological resources; cultural/historical/archaeological resources; resource use patterns; traffic and transportation; public health and safety;

hazardous materials and hazardous wastes; public services and utilities; socioeconomics; environmental justice; visual resources/aesthetics; and cumulative, indirect, and growth-inducing effects.

Locations Where the DEIS is Available for Review: The DEIS is available for review during regular business hours at the BIA Pacific Regional Office at the address noted above in the **ADDRESSES** section of this notice, and the Redding Public Library, 1100 Parkview Avenue, Redding, California. The DEIS is also available online at *http://www.reddingeis.com.* To obtain a compact disc copy of the DEIS, please provide your name and address in writing or by phone to Chad Broussard, Bureau of Indian Affairs, Pacific Regional Office. Contact information is listed in the **FOR FURTHER INFORMATION CONTACT** section of this notice. Individual paper copies of the DEIS will be provided upon payment of applicable printing expenses by the requestor for the number of copies requested.

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

Authority: This notice is published in accordance with sections 1503.1 and 1506.6 of the Council on Environmental Quality Regulations (40 CFR parts 1500 through 1508) implementing the procedural requirements of the National Environmental Policy Act of 1969, as amended (42 U.S.C. 4321–4345 *et seq.*), and the Department of the Interior National Environmental Policy Act Regulations (43 CFR part 46), and is in the exercise of authority delegated to the Assistant Secretary—Indian Affairs by 209 DM 8.

Dated: April 5, 2019.

Tara Sweeney,

Assistant Secretary—Indian Affairs.

[FR Doc. 2019–07080 Filed 4–9–19; 8:45 am]

BILLING CODE 4337–15–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[19X R4079V4 RX.12255301.3000000 AZA25613]

Public Land Order No. 7877; Extension of Public Land Order No. 7384; Arizona

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of Public Land Order.

SUMMARY: This Public Land Order (PLO) extends the duration of the withdrawal created by PLO No. 7384 for an additional 20-year term. PLO No. 7384 would otherwise expire on April 19, 2019. This extension is necessary to continue to protect the value of the capital investments, water-oriented developments, and dispersed recreation in the Bureau of Reclamation's (BOR) Lake Pleasant expansion area. PLO No. 7384 withdrew 1,988.27 acres of public lands from settlement, sale, location, and entry under the general public land laws, including the United States mining laws, but not from leasing under the mineral leasing laws for a 20-year period. The lands have been and will remain open to mineral and geothermal leasing.

DATES: This PLO takes effect on April 20, 2019.

FOR FURTHER INFORMATION CONTACT: Sara Ferreira, Land Law Examiner, at telephone 602–417–9598 or by email at *sferreir@blm.gov,* Bureau of Land Management, Arizona State Office, One North Central Ave., Suite 800, Phoenix, AZ 85004. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Relay Service (FRS) at 1–800–877–8339 to contact Ms. Ferreira. The FRS is available 24 hours a day, 7 days a week, to leave a message or question. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: This Order extends the existing withdrawal to continue to protect the capital investments, water-oriented developments, and dispersed recreation resources in the Lake Pleasant Expansion area.

ORDER

By virtue of the authority vested in the Secretary of the Interior by Section 204 of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1714, it is ordered as follows:

1. Subject to valid existing rights, PLO No 7384, (64 FR 19386, (1999)), which withdrew public lands from settlement, sale, location, and entry under the general public land laws, including the United States mining laws, but not from leasing under the mineral leasing laws is hereby extended for an additional 20-year period to protect the Bureau of Reclamation's Lake Pleasant expansion area.

2. The withdrawal extended by this Order will expire on April 19, 2039, unless as a result of review conducted prior to the expiration date pursuant to Section 204(f) of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1714(f), the Secretary determines the withdrawal shall be further extended.

Dated: April 3, 2019.

Joseph R. Balash,

Assistant Secretary—Land and Minerals Management.

[FR Doc. 2019–07030 Filed 4–9–19; 8:45 am]

BILLING CODE 4332–90–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[19X LLUTW01000 LXX0000.XX0000, UTU–78501]

Notice of Proposed Withdrawal Extension, Diamond Fork System, Bonneville Unit of the Central Utah Project, Public Land Order No. 7422, and Opportunity for Public Meeting, Utah

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice.

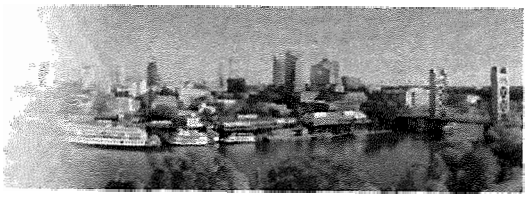
SUMMARY: The Assistant Secretary—Land and Minerals Management (ASLM) on behalf of the Central Utah Project Completion Act Office (CUPCAO), proposes to extend the duration of Public Land Order (PLO) No. 7422 for an additional 20-year term. PLO No. 7422 withdrew approximately 2,795 acres of National Forest System lands from location and entry under the United States mining laws, but not from leasing under the mineral leasing laws, to protect the Diamond Fork System, Bonneville Unit of the Central Utah Project. This Notice advises the public of an opportunity to comment on the proposed withdrawal extension and to request a public meeting. This Notice also corrects the projects acreage figure for the lands and corrects the Bureau of Land Management's (BLM) serial register number assigned to the official case record of the withdrawal.

DATES: Comments and requests for a public meeting must be received by July 9, 2019.

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Attention: Mia Kawamoto

ANALYTICAL ENVIRONMENTAL SERVICES
1801 7TH STREET, STE 100
SACRAMENTO, CA 95811

Press Release/Notice of Availability and Public Hearing

Notice of Availability of a Draft Environmental Impact Statement for the Proposed Redding Rancheria Fee-to-Trust and Casino Project, Shasta County, California

SUMMARY: This notice advises the public that the Bureau of Indian Affairs (BIA) intends to file a Draft Environmental Impact Statement (DEIS) with the United States Environmental Protection Agency (EPA) in connection with the Redding Rancheria's (Tribe) application requesting that the United States acquire approximately 232 acres of land in trust in Shasta County, California. The proposed fee-to-trust property is located in an unincorporated part of Shasta County, California, approximately 1.6 miles northeast of the existing Redding Rancheria, and about two miles southeast of downtown Redding. The proposed trust property includes seven parcels, bound by Bechelli Lane on the north, private properties to the south, the Sacramento River on the west, and Interstate 5 on the east. The Tribe is proposing to construct a casino resort that includes a casino, hotel, event/convention center, outdoor amphitheater, retail center, and associated parking/infrastructure. The new facility would replace the Tribe's existing casino, and the existing casino buildings would be converted to a different Tribal use. Additional information on the proposed action, alternatives to the proposed action, and potential environmental impacts associated with the proposed action and alternatives can be found in the DEIS. Public comments on the DEIS will be accepted for 45 days from the publication of the EPA Notice of Availability in the Federal Register and must arrive no later than June 3, 2019. A public hearing will be held during this 45-day public comment period.

DEIS AVAILABILITY: The DEIS is available for review during regular business hours (8:00AM – 4:30PM) at the BIA Pacific Regional Office, 2800 Cottage Way, Sacramento, California, and the Redding Public Library, 1100 Parkview Avenue, Redding, California. The DEIS is also available online at http://www.reddingeis.com. To obtain a compact disc copy of the DEIS, please provide your name and address in writing or by phone to Chad Broussard, Bureau of Indian Affairs, Pacific Regional Office, 2800 Cottage Way, Sacramento, California; chad.broussard@bia.gov; (916-978-6165). Individual paper copies of the DEIS will be provided upon payment of applicable printing expenses by the requestor for the number of copies requested.

PUBLIC HEARING: A public hearing will be held at the Redding Memorial Veterans Hall, 1605 Yuba Street, Redding, CA, 96001, on May 20, 2019 from 6:00PM until the last comment is heard.

HOW TO COMMENT ON THE DEIS: Comments may be spoken at the public hearing or given in writing by hand delivery, mail, or email. Written comments may be hand delivered at the public hearing or hand delivered/mailed to Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Region, 2800 Cottage Way, Sacramento, California 95825. Please include your name, return address, and "DEIS Comments, Redding Rancheria Project" on the first page of your written comments. You may also submit comments through email to Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, at chad.broussard@bia.gov. Please include your name and return address on the first page of your written comments. If emailing comments, please use "DEIS Comments, Redding Rancheria Project" as the subject of your email. All comments must be received by June 3, 2019. Before including your address, telephone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask in your comment that your personal identifying information be withheld from public review, the BIA cannot guarantee that this will occur.

NOTARY PUBLIC STATE OF TEXAS
LIZBETH AILEEN CORDERO
My Notary ID # 131868068
Expires January 25, 2023

DECLARATION OF PUBLICATION
(C.C.P.2015.5)

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the printer and principal clerk of the publisher of , printed and published in the City of Sacramento, County of Sacramento, State of California, daily, for which said newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Sacramento, State of California, under the date of September 26, 1994, Action No. 379071; that the notice of which the annexed is a printed copy, has been published in each issue thereof and not in any supplement thereof on the following dates, to wit:

1 Insertions

Published On:
April 14, 2019

Legals Clerk

COUNTY OF DALLAS
STATE OF TEXAS

I certify (or declare) under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Sacramento, California, on **April 15, 2019**.

Notary Public

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RECORD SEARCHLIGHT

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Record Searchlight

PART OF THE USA TODAY NETWORK

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STATE OF WISCONSIN, COUNTY OF BROWN:

I hereby certify that the Record Searchlight is a newspaper of general circulation within the provisions of the Government Code of the State of California, printed and published in the city of Redding, County of Shasta, State of California; that I am the principal clerk of the printer of said newspaper; that the notice of which the annexed clipping is a true printed copy was published in said newspaper on the following dates, to wit:

April 14, 2019

such newspaper was regularly disributed to its subscribers during all of said period

Kevin Yang
Legal Clerk

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

Subscribed and sworn to before on April 15, 2019:

Notary, State of WI, County of Brown

11/9/22
My commission expires

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PO #: Rancheria Project

KAZOUA YANG
NOTARY
PUBLIC
STATE OF WISCONSIN

Press Release/Notice of Availability and Public Hearing

Notice of Availability of a Draft Environmental Impact Statement for the Proposed Redding Rancheria Fee-to-Trust and Casino Project, Shasta County, California

SUMMARY: This notice advises the public that the Bureau of Indian Affairs (BIA) intends to file a Draft Environmental Impact Statement (DEIS) with the United States Environmental Protection Agency (EPA) in connection with the Redding Rancheria's (Tribe) application requesting that the United States acquire approximately 232 acres of land in trust in Shasta County, California. The proposed fee-to-trust property is located in an unincorporated part of Shasta County, California, approximately 1.6 miles northeast of the existing Redding Rancheria, and about two miles southeast of downtown Redding. The proposed trust property includes seven parcels, bound by Bechelli Lane on the north, private properties to the south, the Sacramento River on the west, and Interstate 5 on the east. The Tribe is proposing to construct a casino resort that includes a casino, hotel, event/convention center, outdoor amphitheater, retail center, and associated parking/infrastructure. The new facility would replace the Tribe's existing casino, and the existing casino buildings would be converted to a different Tribal use. Additional information on the proposed action, alternatives to the proposed action, and potential environmental impacts associated with the proposed action and alternatives can be found in the DEIS. Public comments on the DEIS will be accepted for 45 days from the publication of the EPA Notice of Availability in the Federal Register and must arrive no later than June 3, 2019. A public hearing will be held during this 45-day public comment period.

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April 14, 2019 #3499899