

**From:** A Behrouz <[abehrouz@hotmail.com](mailto:abehrouz@hotmail.com)>  
**Sent:** Tuesday, July 9, 2024 1:57 PM  
**To:** [admin@shilohresortenvironmental.com](mailto:admin@shilohresortenvironmental.com) <[admin@shilohresortenvironmental.com](mailto:admin@shilohresortenvironmental.com)>  
**Cc:** [chad.broussard@bia.gov](mailto:chad.broussard@bia.gov) <[chad.broussard@bia.gov](mailto:chad.broussard@bia.gov)>  
**Subject:** Re: Notice of Availability for Environmental Impact Statement

DEIS Comments, Shiloh Resort and Casino Project

I am in favor of this new casino. I want to make sure there is affordable bus service from marin county.

\*I want to also receive the results of the issue regarding graton casino and why they cancelled the bus service from marin county. thank you if possible.

Do the board of supervisors of marin county and sonoma county know of the bus cancellation?\*

We want to make sure the bus is affordable ( \$5.00 round trip).

we want the new casino to mirror and copy the exact bus schedule of river rock.

river rock helps citizens of marin county to casino.

graton does not.

we want windsor casino to help marin county.

<https://www.riverrockcasino.com/visiting/casino-bus-schedule/>

i thank you

**From:** A Behrouz <[abehrouz@hotmail.com](mailto:abehrouz@hotmail.com)>  
**Sent:** Wednesday, July 10, 2024 1:20 PM  
**To:** [admin@shilohresortenvironmental.com](mailto:admin@shilohresortenvironmental.com)  
**Cc:** [chad.broussard@bia.gov](mailto:chad.broussard@bia.gov)  
**Subject:** Re: Notice of Availability for Environmental Impact Statement

DEIS Comments, Shiloh Resort and Casino Project

Dear Sirs ;

I am in favor of this new casino. Besides transportation from marin county; I would like food-court in new casino.

i thank you,

Behrouz, Arash

**From:** Laurie Smith <[laurieks5@gmail.com](mailto:laurieks5@gmail.com)>

**Sent:** Tuesday, July 9, 2024 2:20 PM

**To:** [admin@shilohresortenvironmental.com](mailto:admin@shilohresortenvironmental.com)

**Subject:** Re: Notice of Availability for Environmental Impact Statement

Hi Chad,

I have a question you could interpret as a comment.

Will there be a gas station? We buy diesel at casinos whenever possible; Rabbit tracks in Cedarville and Twin Pines on hwy 29. I will support your project on that alone.

If you need a Nurse on site once in a while, I live 5 minutes away. I specialize in foot care for those who can no longer reach their toes. "No nail too thick"

I am against pyrotechnic shows; they terrify my dairy goats. The new drone shows seem promising but I haven't been to one.

Is this kind of information better in the BIA feedback form?

Thank you kindly,

Laurie Smith RN CFCS

455 Donna Drive Windsor CA 95492

7073210494

**From:** "Peter Walker" <[pwalker49@gmail.com](mailto:pwalker49@gmail.com)>  
**Sent:** Tuesday, July 9, 2024 1:41 PM  
**To:** [admin@shilohresortenvironmental.com](mailto:admin@shilohresortenvironmental.com)  
**Subject:** Re: Notice of Availability for Environmental Impact Statement

## Submitted by:

**Peter Walker**  
**12620 DuPont Rd.**  
**Sebastopol, CA 95472**  
**Email:** [mmraminvest@yahoo.com](mailto:mmraminvest@yahoo.com)

## Report on the Negative Consequences of the Proposed Shiloh Resort and Casino Project

### Contact Agent:

**BIA Pacific Regional Office**  
By appointment by contacting Chad Broussard,  
Bureau of Indian Affairs, Pacific Regional Office

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## Introduction

The Bureau of Indian Affairs (BIA), in cooperation with the National Indian Gaming Commission (NIGC) and the United States Environmental Protection Agency (EPA), has released a Draft Environmental Impact Statement (DEIS) for the proposed Shiloh Resort and Casino Project by the Koi Nation of Northern California. This report aims to analyze the potential negative consequences outlined in the DEIS.

Arguments against the proposed project:

## Land Resources

Developing a casino resort on the 68.6-acre site near Windsor, Sonoma County, California, involves significant land alteration. The transformation from its current state to a developed resort can lead to habitat destruction, soil erosion, and changes in land use patterns. The construction activities might disrupt the local flora and fauna, leading to long-term ecological impacts.

## Water Resources

The project may significantly affect local water resources. Increased water demand for the resort, including the casino, hotel, spa, and other facilities, can strain existing water supplies. The construction and operation phases also pose water pollution risks through runoff, which can carry sediments, construction debris, and contaminants into nearby water bodies, adversely affecting water quality and aquatic life.

## Air Quality and Climate Change

The construction activities and increased vehicle traffic associated with the resort are expected to elevate local air pollution levels. Emissions from construction machinery, increased traffic congestion, and energy consumption at the

resort contribute to greenhouse gas emissions, exacerbating climate change. The project's Draft Conformity quality impacts.

## **Noise**

The project will likely increase noise levels in the surrounding area due to construction activities, increased traffic, and operational noise from the resort's facilities. This noise pollution can disrupt the local community's peace and wildlife, potentially leading to adverse health effects for residents and disturbances to animal habitats.

## **Biological Resources**

The proposed site is home to various plant and animal species. The development could lead to habitat loss and fragmentation, threatening local biodiversity. Special attention is needed to protect any endangered or threatened species that might inhabit the area. The DEIS should provide detailed mitigation plans to minimize these impacts.

## **Cultural and Paleontological Resources**

The construction might affect cultural and paleontological resources in the area. Any excavation or land alteration could potentially damage or destroy artifacts and fossils. It is crucial to conduct thorough surveys and involve local indigenous groups to protect and preserve these valuable resources.

## **Transportation and Circulation**

The influx of visitors to the resort is expected to increase traffic congestion in and around Windsor. This can lead to longer travel times, higher emissions from idling vehicles, and increased risk of accidents. The DEIS should address traffic management plans to mitigate these impacts and ensure the safety and convenience of local residents and visitors.

## **Land Use**

The project represents a significant change in land use, potentially conflicting with existing land use plans and zoning regulations. This shift might lead to opposition from the local community and complicate regional planning efforts.

## **Hazardous Materials and Hazards**

The construction and operation of the resort involve handling hazardous materials, posing potential risks to workers and the environment. Proper storage, handling, and disposal procedures must be in place to mitigate these risks.

## **Public Services and Utilities**

The increased demand for public services and utilities, such as water supply, wastewater treatment, and emergency services, can strain existing infrastructure. The local government may need to invest in upgrades to accommodate the resort's needs, potentially leading to increased taxes or reallocation of resources from other community projects.

## **Socioeconomics**

While the project may create jobs and stimulate economic growth, it might also lead to increased living costs and potential displacement of lower-income residents. The social dynamics of the community could change, leading to potential conflicts and inequalities.

## **Environmental Justice**

The DEIS should evaluate whether the project disproportionately affects minority and low-income populations. Ensuring environmental justice requires that the benefits and burdens of the project are equitably distributed.

## **Visual Resources**

The construction of a large resort complex will alter the visual landscape of the area, potentially detracting from the natural beauty and rural character of the region. This change might affect local tourism and the aesthetic value of the community.

## **Cumulative, Indirect, and Growth-Inducing Effects**

The cumulative impact of the resort, when combined with other ongoing and future projects, could exacerbate environmental degradation. Indirect effects, such as increased development pressure in the surrounding areas, should be thoroughly assessed to understand the broader implications of the project.

## **Conclusion**

The DEIS for the Shiloh Resort and Casino Project highlights several potential negative consequences that need careful consideration and mitigation. Addressing these issues through comprehensive planning and community engagement is essential to minimize adverse environmental and social impacts, ensuring sustainable development that benefits the Koi Nation and the broader community.

This submission is a summary of objections to the project. The complainant is prepared to submit more objections once additional information is made available.

Submitted July 9, 2024

Signed,

Peter Walker

**From:** Carol Rash <[rashcarol@yahoo.com](mailto:rashcarol@yahoo.com)>

**Sent:** Monday, July 8, 2024 6:41 PM

**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>

**Subject:** [EXTERNAL] DEIS Comments , Shiloh Resort and Casino Project

I5

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Dear Mr. Broussard

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

In 2019, we had to evacuate our town due to the Kincade Fire heading towards it. By Evacuating, our town was saved by the fire crews taking a stand. We had time for evacuation unlike many other towns that have been consumed by fires , but it took hours for an orderly evacuation because there are 2 main evacuation routes: US 101 and Old Redwood Highway. Since that evacuation, several low cost housing large apartment buildings have been added along Old Redwood Hwy near the proposed site and there will be many more residents to evacuate. If the Casino has to be evacuated that would add to traffic jams and possibly cost lives.

We have complied with water restrictions during several drought years. The casino will have to drill wells which will lower the water table. We conserve water in our home, but visitors to the Casino and Hotel will not restrict their water use.

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

We are strongly opposed to having this Casino built.

Thank you for your attention to this matter.

Carol and Joe Rash  
180 Dartmouth Way  
Windsor, California 95492. [rashcarol@yahoo.com](mailto:rashcarol@yahoo.com)

Sent from my iPad

**Re: Notice of Availability for Environmental Impact Statement**

**16**

Wed 7/10/2024 5:22 PM

**From:** Laurie Smith

**To:** admin@shilohresortenvironmental.com

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**Message**

apologies, I thought you represented the Koi Nation. Who can I ask about this?

Humbly,

Laurie

## Shiloh Casino

Mon 7/15/2024 3:22 PM

**From:** Robert Combs**To:** admin@shilohresortenvironmental.com

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I have been living in Sonoma County for over 20 years. There have been numerous housing developments and 2 major Casinos build within that time. I am appalled that there might be another casino in this County! I am well aware of the traffic issues on Shiloh Road at this time and can't imagine what a gigantic casino would do to exacerbate the problem. This is a very tenuous fire area and it would be impossible to evacuate this already crowded 2 lane road in case of an emergency. I also resent the fact that as a resident I must carefully monitor my water use both inside my home and for landscaping. Now we have a potential casino which has been estimated to use 250,000 gallons per day! This is insanity!!

Who benefits from this project? Certainly not the residents in the surrounding area. Certainly not the customers who would like to frequent the shopping center there. Certainly not the church attendees who gather at the 2 churches in the area. Certainly not the local children who play soccer and baseball in the field across the street. I believe I read that this is not even a Sonoma County tribe but a tribe from Oklahoma backing the project.

I hope you get a great deal of negative feedback and I hope someone is listening to the citizens of the County when they strongly object to this casino.

Nancy Combs  
514 North Street  
Healdsburg, CA

**From:** Janice Lon <[janlonny@gmail.com](mailto:janlonny@gmail.com)>  
**Sent:** Tuesday, July 9, 2024 1:50 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] Deis, Shiloh report

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I8-1

Hello, I am responding to the report for building a casino on Shiloh Rd which is the gateway to the beautiful Alexander Valley.  
I totally reject this location. One reason is to the impact on the nesting of eagles near Leslie Rd off of AV Rd.  
Thank you,  
Janice Kane  
Santa Rosa CA 95401  
Former resident of Alexander Vslket

Sent from my iPhone

From: Diane B <[joysing@sonic.net](mailto:joysing@sonic.net)>  
Sent: Tuesday, July 9, 2024 2:46 PM  
To: Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
Subject: [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project

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

Dear Mr. Broussard,

I am writing to you regarding the Koi Nation of Northern California's Proposed Shiloh Resort and Casino Project.

This project has no business being built in this location.

The project would destroy the current quiet, small-town country neighborhood with noisy, congestion and traffic jams.

Many young children live in this neighborhood. Parents did not buy homes in this area with understanding that a huge casino would be built in their neighborhood. Traffic will create dangerous situations for children.

If there is a wildfire, which this area has suffered from in recent years, the project will create extremely unsafe and dangerous evacuation conditions, with very few escape routes for a huge mass of people. I've been under evacuation orders twice and nearly a third time since 2017 and have experienced congestion in Santa Rosa as people were fleeing Coffee Park in 2017. It was a nightmare! This community does not need a tragedy.

The project would stress an already stressed water supply system from the massive water and plumbing needs of the casino. With the current climate crisis, our county has experienced many years of drought. You want to approve a water-guzzling resort in the midst of this situation after years of having to conserve water in this county with the uncertainty of the availability of water in future years?

These are just some of my many concerns regarding the building of this casino in the proposed site. It has no business being built in this site. Move it somewhere else.

Sincerely,  
Diane Baines,  
Concerned Citizen of Sonoma County  
2417 Appletree Dr.  
Santa Rosa, California

*"If you feel as though you don't fit into this world.....  
it's because you are here to create a better one."*

USUA

**From:** Kathryn C <mkc-link@sonic.net>  
**Sent:** Wednesday, July 10, 2024 4:38 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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I write because myself and several friends are very frequent users of the freeway interchange of 101 and Shiloh Road. I want to call attention to one problem that creates the potential for automobile accidents that we often find ourselves defending against. For some reason, the on-ramp from eastbound Shiloh Road to southbound 101 has a definite visibility problem whether it is during the commuter hours or late in the evening. A person merging onto 101 southbound heading east from Shiloh Road will have great difficulty seeing merging traffic whether that be other cars that are driving in the commuter onramp Lane or cars coming south on 101 in the right lane. We have mentioned a number of times to each other how challenging that ramp is and how easy it would be to have an accident. May we suggest that the engineers go out and review that ramp as it will get significant increases in usage with the development of the casino.

Thank you.

Kathy  
Cirksena  
Santa Rosa CA

**From:** Pamela Bell Simmons <bellsambulance@aol.com>  
**Sent:** Wednesday, July 10, 2024 5:58 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Re: EIS Comments KOI Nation Shiloh Resort and Casino

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Mr. Broussard,  
I would like to introduce my company as the 911 Emergency Medical Services provider in Windsor since 1956. We look forward to being a continued service to the KOI Nation on the Shiloh location project.

If you require a more formal letter of intent and or service, please let me know--or forward me to the proper contact person.

Thank you in advance,

Pamela Bell Simmons  
Bell's Ambulance Service  
Family Owned & Operated Since 1956  
office: 707.433.1408  
fax: 707.433.1461

**From:** Heidi Doggwiler <[hdoggwiler@msn.com](mailto:hdoggwiler@msn.com)>  
**Sent:** Thursday, July 11, 2024 1:19 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] Proposed casino project on Shiloh in Windsor

I12

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

To whom it may concern;

Upon reviewing the Draft EIS, I reiterate my strong objections to this project. Not only is it wrong for our area, but the Koi have NO attachment to our community and should not be allowed to reservation shop to gain a site that benefits their financial interests.

Sincerely,

Heidi M. Doggwiler  
619 Smoketree Ct.  
Windsor, CA 95492  
707-836-4029

**From:** paul I <paul.ignatius.lynch@gmail.com>  
**Sent:** Thursday, July 11, 2024 3:53 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] KOI NATION Support

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

We lived in Lake County until the 2015 Valley Fire on Cobb. Now in Bloomfield, Sonoma County. We support their project as since the Lake County fires thousands of us lost our their homes and were forced to move. In our case to Sonoma County. Give the Koi Nation the keys to prosperity and thrive near Windsor. Their homes were taken by invaders that took their land and voice. Give them a 2nd chance. Sonoma is a bigger tourist destination than visitors to Hawaii. Give them Love to reunite their tribe and family. There is plenty for the Koi with this project. Thank you, Paul Lynch

Volsur 2 1/2 1/2 1/2

I14

1112 Enzos Way  
Windsor CA 95492

PACIFIC REGIONAL OFFICE  
2024 JUL 29 AM 11:03  
BUREAU OF INDIAN AFFAIRS  
July 25, 2024

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W — 2820  
Sacramento, CA 95825

Dear Ms. Dutschke,

I can only imagine the stress this casino will add to the infrastructure of Sonoma County and specifically Windsor. We are not equipped to deal with another gigantic casino in this quaint, bucolic county. The behemoth that was built, and recently added to, in Rohnert Park, is enough of an eyesore for one county.

Nearly 70 acres will be destroyed with the following: a 540,000-square-foot casino with 2,750 gaming machines, five restaurants, five bars, a coffee shop, a 2,800-seat event center and two ballrooms, plus an adjacent 400-room hotel and spa. The plan would include more than 5,000 parking spaces.

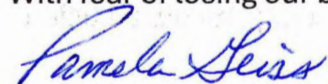
Imagine a facility that will house a 2,800-seat event center. The idea of that alone is mind-boggling! 5000 parking spaces = 10,000 people gambling, drinking, causing police and fire/EMS intervention, the added traffic and subsequent trash is terrifying.

I cannot imagine who would fill this facility with Graton Rancheria so very close by. I cannot imagine how an event center of this size would be worthwhile, especially considering the recent proposal put to the County of Sonoma for a conference center in downtown Santa Rosa.

The residential community nearest to the acreage will sadly be negatively impacted by traffic, crime, vagrants, noise pollution, air pollution, and more. The California power grid is already maxed out on many days and power was recently cut to several communities in the County. What on earth will happen to our water resources, with this grotesque addition to our community?

I beseech you to reject this proposal. I can only imagine the negative impact.

With fear of losing our beautiful area,



Pamela Geiss  
25+ year resident of Windsor, CA

**From:** Kyle Kennedy <kylekenn@gmail.com>

**Sent:** Friday, July 12, 2024 11:54 AM

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

**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

I15

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To whom it may concern,

Windsor is a peaceful, small town, family oriented community. Allowing a casino will threaten that and invite unsavory visitors to the town. Not to mention the environmental & traffic issues this development would present.

As someone who was raised in Windsor, has parents & in-laws in Windsor, and someone who is now raising his own family in Windsor. We will all strongly consider moving away if this project goes forward. This is not an uncommon sentiment in my circle of Windsor residents. Windsor has enjoyed a very prosperous few decades of growth and development, don't get too greedy.

Thanks for your time,  
Kyle Kennedy  
349 Wilson Ln, Windsor, CA 95492

**From:** cmwebers <cmwebers@comcast.net>  
**Sent:** Friday, July 12, 2024 5:00 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments Koi Nation Shiloh resort & casino

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Mr. Broussard, I have lived in Sonoma County since 1968 & in Windsor since 1997. Sonoma County is such a beautiful area, a lovely place to live. Naturally I have seen it grow quite a bit in these past years but on the whole it has retained its rural atmosphere, natural beauty & livability.

My husband & I enjoy walking for exercise and live not far from the proposed site of the Koi casino. I cannot imagine having a huge resort in that area. It would ruin everything we enjoy about where we live. The traffic alone would be a nightmare! The roads are narrow and have enough vehicles as is without adding a huge influx of people coming into the area. It is a rural area but with quiet neighborhoods, too, and a lovely park nearby that does not need a resort in the middle of it. Plus there is no real view, like ocean or mountains, that add to the ambience of resort surroundings.

I won't even go in to what a 24 hour casino would be like. You should know it could attract an undesirable element of the population, plus possible people being "over served" with alcohol & causing problems or leaving the area, driving, after a time of drinking. Windsor is a family oriented town & a casino has no place in it.

Thank you for your time.

Charlene Weber  
226 Viking Ct  
Windsor 95492

**From:** Larry McFadden <lmacmail@aol.com>  
**Sent:** Saturday, July 13, 2024 8:37 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Cc:** Mike McFadden <mike1121@comcast.net>  
**Subject:** [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project.

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Mr. Broussard,

I am a local neighbor **opponent** of this oversized commercial project in a rural residential neighborhood.

Top concern is the high volume of vehicle traffic this project would attract. Plus concern for potential wildfire all at once vehicle evacuation onto inadequate road capacities to accommodate. 5,000 parking spaces fleeing at once says it best. Mayhem & Panic! Compromised public safety.

A major secondary concern is municipal water capacity to accommodate a 400 room hotel alone, not to mention numerous additional resort & casino high volume water demands.

**Only in a commercial setting would a business project of this size be appropriate.** Be assured we have nothing personal against gambling, live events, fine dining, luxury lodging, etc. But in the proper scaled setting, not among single family homes in a suburban bedroom community.

Thank You for your understanding.

Sincerely,  
Larry & Clarice McFadden  
7248 16th Hole Drive  
Windsor 95492

I18

**From:** Brenda Smith <[bsmth44@gmail.com](mailto:bsmth44@gmail.com)>**Sent:** Saturday, July 13, 2024 10:32 AM**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>**Subject:** [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project-No Vote!**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

As a resident, Elementary Teacher, and Senior living in Sonoma County, a place I grew up in since 1972, I adamantly am opposed to the Koi Nation Casino Project!

I have been following this story and do not want another Casino in Sonoma County.

The open space and beauty of this County needs to be protected.

I agree with the Sonoma County Board of Supervisors....

Windsor Town Council...

Senator Mike McGuire...

Reps. Mike Thompson and Jared Huffman...

and Sen. Alex Padilla....

No Casino!

I appreciate you hearing my voice and collecting my opposition vote on this matter.

Thank you,

Ms. Brenda Smith

Proud Teacher!

**From:** Anne Gray <annegray123@sbcgloba.net>

**Sent:** Saturday, July 13, 2024 1:41 PM

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

**Subject:** [EXTERNAL] Feedback - Timing to Repond to Koi Nation Oklahoma Cikasaw Caino Proposal

I19

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Chad,

On Thursday July 11th I got your letter about the next steps in the above. Why are you allowing for such an incredibly short time to respond and attend the Zoom. Many are away on vacation in July and you are not even giving the public a month's time. More like 2.5 weeks notice.

Why is the timing so very short? Is this a legal limitation? Already I've contacted many folks who are away for vacation now and won't be able to participate.

Anne Gray  
Santa Rosa

I20

**From:** Bruce Loring <bkloring49@gmail.com>  
**Sent:** Saturday, July 13, 2024 1:45 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] DIES Comments, Shiloh Resort and Casino Project

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I'm writing to offer a solution to the conflict over the proposed casino development near Shiloh Park. Rather than compete with the other nations over a finite number of customers, I suggest that the Koi Nation be allowed to invest in one or more nearby casinos already built. This influx of capital from the Koi Nation could be used to upgrade, expand, maintain current facilities, or possibly pay down debt. It doesn't seem fair that some of the nations get to have a casino but others don't, and on the other hand, how many casinos do we actually need? The BIA is in the position to impartially arbitrate a buy-in plan whereby the Koi Nation pays to have a few seats on the board of directors of a casino and participate in a share of the profits in perpetuity. It's a win-win-win!

I20-1

Bruce Loring  
328 Kiva Place  
Santa Rosa, CA  
707-292-9259

**From:** Louise Calderon <louisecalderon338@comcast.net>  
**Sent:** Saturday, July 13, 2024 2:20 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] DEIS Comments, Shiloh Resort and Casino project

121

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#### NO ON SHILOH RESORT AND CASINO PROJECT

The Koi Nation of Lower Lake Rancheria is located in Lake County and has no affiliation with Sonoma County. The Pomo Indians have recently developed a newly constructed housing development within the boundaries of the Town of Windsor. The Koi Nation's proposed site for a casino, winery, convention center, would be located across the road from Shiloh Regional Park and established neighborhoods. Shiloh Park is comprised of 850 acres consisting of oak woodlands, mixed evergreens, shaded creek. It has 6 great trails for birding, hiking, walking and more. It is a peaceful sanctuary for solitude with its magnificent views and trails for all. Within close proximity to Windsor is Graton Casino, River Rock and farther away in Middletown, Twin Pines. What these casinos have in common is that they are built away from populated neighborhoods. We need our open spaces that generates and encourages natural habitat and an enjoyable family community where all feel safe. This would not be the case with a casino and the population that it encourages on roads that cannot support the traffic. PLEASE DO NOT TAKE AWAY OUR COMMUNITY AND REPLACE IT WITH ANOTHER CASINO.

Louise Calderon, 338 Winemaker Way, Windsor, CA. 95492

**From:** ct6k2 <ct6k2@protonmail.com>  
**Sent:** Sunday, July 14, 2024 2:57 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project

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Dear Mr. Broussard:

I am opposed to the Shiloh Casino Project for the following reasons:

- \*Groundwater usage at 750000 gals per month, my calculation. Santa Rosa has been (up to 2 years ago) been in a period of extreme drought.
- \*Koi Indiana are from Upper Lake in Lake County, 60- ish miles away.
- \*Urban Separators (Green Belt). People in Sonoma County don't want to turn into San Jose, where urban sprall has turned it into one big city. No way San Jose!
- \*Water Pollution- the runoff from the paved areas would run into the creeks, home to endangered Steelhead and Coho salmon.
- \*Light Pollution.
- \*Neighbors

In my opinion, it is a terrible idea to put a casino there.

Thank you for your time,  
Chad Thistle,  
Santa Rosa, CA

Sent from Proton Mail Android

**From:** Katherine Schram <[schram@sonic.net](mailto:schram@sonic.net)>  
**Sent:** Monday, July 15, 2024 3:21 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] EIS, Koi Nation Shiloh Resort and Casino

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Dear Sir,

I have read the Draft Environmental Impact Statement for the Koi Nation's proposed Shiloh Resort and Casino Project.

The only acceptable and appropriate alternative is (3) a no-action alternative. There are many negative environmental problems with this project, but fire is at the top of my environmental concerns. Shiloh Road is my route for evacuation. I have been evacuated twice since 2017. There is absolutely no way to safely get everyone evacuated if another 23,000 people from the Casino are flooding the streets and the freeway.

Please make the responsible decision and select (3) the no-action alternative.

Thank you,

Katherine Schram  
7335 Shiloh Ridge  
Santa Rosa, CA 95403

**From:** brian bollman <[bdbollman@sbcglobal.net](mailto:bdbollman@sbcglobal.net)>

**Sent:** Monday, July 15, 2024 4:31 PM

**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>

**Subject:** [EXTERNAL] KOI Casino EA

I24

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There are at least three problems with the Koi Casino EA

- 1) It does not address whole-town traffic affects. When major changes are made to intersections, some people alter the way they get to work, school, etc. As a result, major changes in intersections and roadways can affect traffic in other parts of town.
- 2) It does not address housing needs. Options A and B do not provide housing, which means that any employees will be competing for housing that already exists. The official word in Sonoma County is that we already have a housing shortage, any large project expected to increase local employment must provide housing on site or nearby.
- 3) It does not address (or even mention?) global warming impacts

Thank you,

Brian Bollman  
9464 Wellington Cir.  
Windsor, CA 95492

**From:** Bill Bolster <billbolster@gmail.com>  
**Sent:** Tuesday, July 16, 2024 6:30 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project

I25

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My wife and I have lived at 6500 Faught Rd., Santa Rosa, CA since September, 1977 (46 years).

Here are our objections to the Koi Nation Shiloh Resort and Casino:

1. This development will have a significant impact on traffic on all the surrounding roads. People avoiding the congestion will spill onto our narrow winding country road (Faught Rd.). It is not designed for that.
2. Fire danger. This development is in the path of the last 2 fires, Tubbs and Kinkade. The vineyard is supposed to be a fire break. The development will be fuel for the next big fire.
3. We live in the country and have 2 wells on our property. Until the drought, we had no problems. In the last 5 years one well went dry and the 2<sup>nd</sup> is marginal. We do not irrigate our landscaping anymore and keep our fountain dry. If the Koi Nation builds the development they will draw down the water table more. I will have to drill an expensive deep well. The very least they should do is to get their water from the Town of Windsor or the County of Sonoma so that they live with the same rules others do.
4. This location is not near the Koi Nation's home. That is 48 miles away in Lake County. No other tribe has built a development farther than 15 miles from their home. This is a terrible precedent to set.
5. Sam Salmon, former mayor of Windsor and now on the town council, suggested that the suitable land for this development was on the vacant land south of Home Depot on the south side of Shiloh Rd. Easy access, wide road and just off Hwy 101. Not this location far from the freeway and through residential development.

Do not let this development proceed. There are too many issues with the impact of it. Again a terrible precedent to set.

William and Joan Bolster  
6500 Faught Rd. Santa Rosa, CA 95403

**From:** Desiree Langston <[philsdesire23@gmail.com](mailto:philsdesire23@gmail.com)>  
**Sent:** Wednesday, July 17, 2024 6:15 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] 🍷 casino project

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Hi there, I am just writing this email to you to let you know that I think it's a wonderful great idea of the casino going up in Windsor. It's gonna be wonderful and great and I'm looking forward to it and I really hope this happens, there will be many job opportunity for people, along with some entertainment and fun also  
Thank you for your time.  
Desiree  
Sent from my iPhone

**From:** Stefan and Kathy Parnay <skparnay@sonic.net>  
**Sent:** Wednesday, July 17, 2024 7:26 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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Dr. Mr. Broussard and the Bureau of Indian Affairs (BIA) decision makers,

We have been residents of the Town of Windsor for over 25 years, residing within a ½ mile from Koi Nation's proposed resort and casino project site.

**The community, neighbors, businesses, and government officials at the local, state, and federal level, have all opposed the Koi Nation's resort and casino project on the Shiloh Road site because it is not in an appropriate location.** *There are no mitigations that can protect our small, quiet, peaceful, family orientated community from the intense transformation that would be required in order to accommodate the constant activity of a casino/events center/spa/hotel operating 24 hours a day-7 days a week that would bring in thousands of visitors daily.*

127-1

In addition, it is important to acknowledge that, in order to accommodate this massive project, **the residents living along the roadways that need to be widened (as outlined by the traffic mitigations listed in the EIS) will be displaced from their homes through eminent domain law.** *The act of forcing these families to relocate makes, what already feels like an incredibly invasive takeover, even more aggressive and personal.*

We are also concerned about the **huge discrepancy between the Koi Nation's resources and the size of the project.** The Koi Nation is made up of only 90 members so they have partnered with the Chickasaw Nation from Oklahoma (made up of over 70,000 members) for their skills in building, managing and running the resort and casino. *We can't help but wonder who is actually benefitting from this project and what will prevent the Chickasaw Nation from using their position to get a strong foothold into California where they have no historical ties.*

127-2

Regarding the EIS report - in the devastating event that the BIA would approve the Koi Nation's resort and casino despite the strong opposition, we would like to highlight the following issues, hoping that, in the best interest of the local community, the BIA would require them to be resolved before any construction begins:

#### Traffic Concerns

- **The traffic study used in the EIS is incomplete.** The EIS did not take into account the new and increased traffic patterns that will be created once the building projects currently under construction on Shiloh Road are complete. This is a major concern as those projects (apartment buildings and businesses) will add hundreds of cars entering and exiting off of Shiloh Road and Old Redwood Highway every day. *The only way to understand the full extent of the traffic mitigations needed for the proposed projects would be to perform an updated traffic study once the current construction projects on Shiloh Road are complete and the buildings are occupied.*
- **The evacuation strategies outlined in the EIS are unrealistic and unsafe.** In the event of an emergency, the scale of thousands of visitors evacuating alongside the local residents and workers is unprecedented. Relying on procedures developed by lead agencies after the Tubbs fire and the outdated traffic study that did not include the current construction projects on Shiloh Road to develop an evacuation plan is an insufficient strategy to handle the magnitude of cars on the road trying to leave the area in the event of an emergency. In addition, the mitigation outlining the evacuation of the guests on site first, before an official notice is announced for the evacuation of local residents, would cause gridlock, panic and potential accidents as concerned residents try to get to their homes in order to prepare for their own evacuation or reunite with loved ones prior to the official evacuation notice. *It is essential that a new and realistic evacuation plan is developed that takes into consideration the thousands of visitors on the Koi Nation's site and the local residents and workers evacuating at the same time so that appropriate road mitigations can be made prior to the site opening.*
- **The Fulton Road/Old Redwood Hwy intersection needs to be included in the traffic study.** This intersection was not discussed on the EIS and is heavily used as an alternative route to and from the Santa Rosa airport, Hwy 101 and Hwy 12, as well as quick access to the Northern parts of Santa Rosa. This intersection would also be an invaluable alternative during an emergency evacuation. Currently, during peak traffic hours, it can be difficult to take a left from Fulton Road onto Old Redwood Hwy towards Windsor. *Since the main access to the Koi Nation's resort and casino parking is on Old Redwood Hwy, evaluating the need for a traffic light and road widening on the Fulton Road/Old Redwood Hwy intersection would be essential.*

127-3

127-4

127-5

- **The magnitude of the road construction needed to accommodate the traffic mitigations outlined in the EIS will create a huge disruption in the community's transportation.** The EIS minimizes the extent that the roadwork would disrupt current traffic patterns, calling it "short term inconveniences and minor delays" (page 242). *When extensive roadwork is performed on major roads used daily by local residents, visitors and shoppers, it is **always** a significant disruption. Travel time will take longer, accidents will occur, businesses will lose revenue for as many months the project takes. A clear plan on how to mitigate the traffic congestion during the construction period is essential.*

#### Concerns about the Oversight of the Mitigation Requirements

**Some of the mitigations outlined in the EIS are vague, lacking clear guidelines, requirements, and oversight.** It is our experience that, out of necessity, large building projects find ways to cut corners in order to save time, money and/or resolve unforeseen issues. Without firm direction and restrictions, the door is left open for variations of noncompliance. *Can the BIA ensure that the mitigations will be adhered to with our community's best interest in mind?* All mitigations required for the construction of the resort and casino need to be stated with clear requirements and oversight. Below are just a few examples of the lack of clarity described in the EIS:

- Page ES-6, 3.5 Biological Resources - Intermittent Drainage (Pruitt Creek) and its associated Riparian Corridor – "(1) Mitigation Measure A: Alterations to riparian vegetation shall be avoided to the maximum extent possible."  
*Who determines what "maximum extent possible" means and when it has been met?*
- Page ES-7, 3.5 Biological Resources, "Mitigation Measure C: Staging areas, access routes, and total area of activity shall be limited to the minimum area necessary to achieve Project goals."  
*It is realistic that project goals can shift once construction starts. What is to prevent the "minimum area" from being too large and create other unforeseen issues?*
- Page ES-14, Section 3.7. Socioeconomic Conditions - Fiscal Impacts – "Prior to operation, the Tribe shall make good faith efforts to enter into a service agreement with the Sonoma County Sheriff's Office (SCSO)..."  
*"Good faith efforts" is vague and does not ensure results. Knowing that crime and traffic accidents will most certainly increase, it should be a requirement that a realistic plan is secured **prior** to operation so that the neighborhoods surrounding the site are protected.*

Please remember that Sonoma County already has two casinos (River Rock Casino and Graton Resort and Casino). When Graton Resort and Casino was built, [River Rock Casino's \(the first casino in Sonoma County\) reported a 50% drop in revenues](#). In order to remain competitive and draw more patrons and profits, River Rock Casino is now proposing [an expansion](#) that will add 3,079 square feet to the gaming floor, 300 more slot machines, four additional gaming tables, 1,214 square feet of extra dining space and features a new 100-room hotel tower with a spa, pool and 7,000 square feet of dining. *How many more resorts and casinos does Sonoma County need before the market is saturated?*

We understand that the Builders Union are the only ones for this project because they are expecting the creation of new jobs. However, **there is no guarantee that the Koi Nations' proposed projects will provide jobs for locals.** *Not only are those construction jobs short term, but it would make sense that the Chickasaw Nation would bring their own resources and workers from Oklahoma to fill those job vacancies.*

We are asking the BIA to please deny the Koi Nation the rights to build their resort and casino in Sonoma County.

Thank you.

Sincerely,  
Stefan and Kathy Parnay  
190 Barrio Way  
Windsor, CA 95492

128

**From:** Jeanne Duben <[jduben@sonic.net](mailto:jduben@sonic.net)>  
**Sent:** Thursday, July 18, 2024 10:37 AM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project

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

July 18, 2024

Chad Broussard

DEIS Comments, Shiloh Resort & Casino Project

Dear Mr. Broussard:

As concerned residents of Windsor, CA, we are passionately against the Koi Nation's plans to build a casino/hotel on Shiloh Road. This development not only impacts our community but also has far-reaching consequences for all of Sonoma County.

Our concerns are valid and pressing. The safety of our community during evacuations, especially in the face of wildfires and earthquakes, is a top priority. The traffic congestion on Shiloh Road and Old Redwood Hwy is already a daily challenge, and adding a casino/hotel will only exacerbate the problem. The strain on water resources is a serious issue, with the county already struggling to provide enough water for its residents. The noise, crime, and lack of contribution to road upkeep from the nation are all additional worries.

With two existing casinos within 20 miles and two hotels currently under construction nearby, the necessity of another casino/hotel is questionable. The strain on resources will only intensify with the addition of this new development.

While we support the economic growth of the Koi Nation, we urge them to explore alternative options that benefit both their community and ours. Residential homes, cultural showcases, shopping centers, and other businesses could offer economic opportunities without the negative impacts of a casino/hotel.

We believe that the proposed casino/hotel is not a good fit for Windsor and Santa Rosa. We implore the Koi Nation to consider the well-being and concerns of the thousands of Sonoma County residents who will be affected by this project. Let us work together to find a solution that benefits everyone involved.

Thank you for your consideration to our concerns.

Jeanne and Richard Duben

9496 Lakewood Drive

Windsor, CA 95492

[jduben@sonic.net](mailto:jduben@sonic.net)

[duben@sonic.net](mailto:duben@sonic.net)

**From:** Karen Fies <karenalvesfies@gmail.com>  
**Sent:** Friday, July 19, 2024 9:45 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Cc:** Karen Fies <karenalvesfies@gmail.com>  
**Subject:** [EXTERNAL] Draft Environmental Impact Statement - Koi Tribe - Shiloh Resort

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>> Dear Mr. Broussard,  
>>  
>> Thank you for the opportunity to comment on the draft Environmental Impact Statement (EIS) for the Koi Nation Shiloh Resort and Casino.  
>>  
>> I live just south of the proposed casino, in the Mark West area of Sonoma County, which includes the unincorporated areas of Larkfield and Wikiup. My comments are as follows:  
>>  
>> - Community input: The EA seems to focus on the impact to the Town of Windsor, but little to no outreach or focus was given to the impacts of the Mark West area. Even though we are unincorporated, we have a strong community presence and would have liked to have shared our concerns and comments on the proposed casino. To say that the casino would have less than significant impact on our property values is absurd (page ES-15). No one wants to live within a few miles of a giant casino.  
>>  
>> - School district: The footprint of the proposed casino is within the Mark West Unified School District and is dangerously close to one of its elementary schools. Casino traffic, disorderly conduct, and drunkenness are real threats to the school district. The EIS states that the casino would have less than significant impact on the school district (page ES-19). While enrollment may not be impacted, the school district will be negatively impacted by the proximity of the proposed casino.  
>>  
>> - Fire evacuation: I'm sure that this will be a very common comment, as all of us living in the area have experienced evacuations many times over. I lost my home in the Tubbs Fire. The evacuation in the middle of the night in a firestorm was terrifying. Adding non-residents who are staying, or working, at the proposed casino would be disastrous. The EIS acknowledges the impact of a proposed casino on fire evacuation (pages ES-20 and ES-21). The proposed casino would share the same evacuation zone as my home. While the proposed mitigation measures say all the right words, in reality, the evacuation of hundreds of proposed casino guests and employees would clog the traffic arteries causing the residents of the area to be in grave danger. Policies and training aren't enough.  
>>  
>> - Traffic: If visitors and/or employees of the proposed casino are fed up with traffic on the freeway, the overflow will negatively impact the surface streets of the Mark West area, particularly Old Redwood Hwy (where people already drive above the speed limit) and Shiloh Road, a small two-lane rural road. The EIS acknowledges the significant impact of a proposed casino on traffic (pages ES-16 and ES-17), but only seeks mitigation to the area around Shiloh Road and the freeway. Attention must be given to the Old Redwood Hwy corridor as well for mitigation efforts.  
>>  
>> - Crime and social service needs: As the retired director of Sonoma County's Human Services Department, I know first hand of crimes in our existing casinos; crime that spills out onto the parking and surrounding areas. In addition to the typical drunk and disorderly behavior and driving, there has been a history of child abuse and neglect (leaving children in cars while parents gamble), addiction, sexual trafficking and exploitation, and other crimes. Additional services are needed to respond to these issues. The EIS states that a proposed casino would have less than significant or potentially significant impact on public services (page ES-27). I think it would be important to study the impacts of Rohnert Park and Sonoma County's services before and after the Graton Casino was built.  
>>  
>> - Green space and Groundwater: Part of the culture of Sonoma County is the community separators or green spaces between cities. The proposed property is currently zoned for agricultural use and is used as a vineyard, creating a beautiful green space between Santa Rosa and Windsor. To "fill in" the community separator, starting with a casino, would change the character of the Mark West area. The EIS acknowledges the potentially significant impact of the proposed casino on groundwater resources (pages ES-22 and ES-23). My local water supplier (California American Water) has wells in the direct proximity of the proposed casino, which could be irreparably harmed by the amount of groundwater that the proposed casino is proposing to use.  
>>  
>> These are a few of my top concerns. Thank you for allowing me to comment on the EIS.  
>>  
>> Sincerely,  
>> Karen Fies  
>> 707-529-0191

I30

**From:** Janet S Marsten <[jsmarsten@gmail.com](mailto:jsmarsten@gmail.com)>  
**Sent:** Saturday, July 20, 2024 4:41 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project

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July 20, 2024

RE: DEIS Comments, Shiloh Resort and Casino Project; NOI Comments, Koi Nation Fee-to-Trust and Casino Project

Dear Bureau of Indian Affairs and Representatives,

This proposed casino resort in our Sonoma County neighborhood by the Koi Nation from Lake County must be stopped.

A 24/7 casino, event center, and hotel would create catastrophic impacts to an already tenuous situation. Mandatory evacuations due to wildfires clogged our few escape routes. People spent hours just attempting to get on Highway 101. Stopping this project could save lives.

Drought is a very real part of living in Sonoma County. The Russian River aquifer is a fragile and limited resource we all depend upon. It could not support a huge development with an estimate of almost 300,000 gallons of water wasted daily and the potential hazards of groundwater depletion and contamination to water quality, both during construction and in the long term.

A popular Sonoma County Regional Park and a Little League park sit directly across from the proposed casino site. It is unthinkable how this project could ruin our unique public landscape. The quiet two-lane roads in this area are popular with many tourist and team bicyclists. If this casino, with its event center, hotel, many restaurants, and parking garage is allowed to proceed, a wildlife corridor, a hiking green space, and a peaceful community would be destroyed. The threat to wildlife migration and public safety is unavoidable.

Casinos unfortunately bring with them crime, noise, and congestion. We cannot allow this to happen to our residential neighborhood and community. Please stop this.

Thank you for your time,  
A.P. and Janet Marsten, Shiloh area residents

**From:** Larry Lapidés <larry@lllapides.com>  
**Sent:** Sunday, July 21, 2024 7:22 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

I31

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Dear Mr. Broussard,

I have yet to read the draft EIS, however, if it is anything like the 2 minute promotional video the Koi Nation produced, the EIS will be both incomplete and inaccurate. The video does not show, does not talk about the proximity to residential neighborhoods. This proximity to residential neighborhoods would be incredibly unusual for a casino, and unwelcome just on general principles let alone issues like wildfire evacuations and water usage.

Second, the video ends with the statement by the narrator that the project "would benefit the Sonoma County communities where the Koi Nation has lived for thousands of years." In fact, the Koi Nation is from Lake County, not Sonoma County, so their statement is completely inaccurate.

I will provide more comments after reading the EIS, and will be on the zoom call July 30.

Best Regards,

Larry

Larry Lapidés

(925) 318-1209

**From:** catherine dodd <[catherine.dodd@gmail.com](mailto:catherine.dodd@gmail.com)>

**Sent:** Friday, July 19, 2024 8:05 PM

**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>

**Subject:** [EXTERNAL] notification of hearing and deadline for comment on Koi Nation Shiloh Resort & Casino

I32

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Chad,

For some reason, I did not receive the written notification of the upcoming hearing and deadline for comment on the latest EIR. I saw it in Supervisor Gore's newsletter.

This is a very short time frame for residents who do not have expertise in Environmental Review to read, digest and comment on a **270 page technical document with an additional 5699 pages of appendices**. It's also the middle of summer and many people are on vacation.

I respectfully request that the deadlines for the zoom meeting and the comment period be extended.

May you be well,

c.

Catherine Dodd

Board Member

Board Member

Advisor, Family

**From:** Sharon Conley <sjcon1951@yahoo.com>

**Sent:** Monday, July 22, 2024 3:35 PM

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

**Subject:** [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project

I33

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Good Day Brad,

I would like to state I am completely against the Shiloh Resort entirely.

Both my children live in Windsor. One off west Shiloh Rd. And the other off Old Redwood Hwy. two blocks from Shiloh Road and Old Redwood Hwy intersection.

This stretch of Shiloh is always crowded with cars traversing on and off Shiloh from freeway and intersecting roads and streets.

With Walmart, Home Depot and other businesses adding more many more cars as well.

The new housing east of home depot, which is not occupied yet, will add a substantial amount of traffic.

There are parents dropping off and picking up children via this intersection at San Miguel Elementary to consider along with a park on the corner.

The heavy activity and exhaust is a health hazard now. We should not add to it by having a casino and resort placed in this area.

There are other casinos presently established close to this area and short driving distances for gamblers and alcohol drinking party goers to choose, i.e. Rohnert Park, Geyserville and Clear Lake.

Let us not turn the beautiful, rural Windsor into

A destination for gamblers, drinkers, criminals to come to. We all know there is a certain person type who comes with the hope of theft, assault and the like.

Respectfully,

Sharon Conley  
233 Burgundy Rd.  
Healdsburg, CA 95448

[Sent from Yahoo Mail on Android](#)

**From:** Valerie Zanette <vzanette4@gmail.com>

**Sent:** Monday, July 22, 2024 4:48 PM

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

**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

I34

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

Hello,

I'm repeating this message that was originally sent back in March 2024.

As a resident of the Esposti Park neighborhood in Windsor, I am very opposed to the Koi Nation Shiloh Resort and Casino project. It will no doubt affect the following areas (to name a few):

- Land resources, use biological resources
- Air quality, noise, + visual resources
- Transportation + circulation
- Socioeconomics
- Cumulative, indirect and growth inducing effects
- Public services + utilities
- Cultural + Paleontological resources
- Environmental justice
- Hazardous materials + hazards

We moved to this area to enjoy our retirement in a safe and beautiful environment with an emphasis on family and community. A monstrosity such as this casino project is not needed or welcome in our little community. Of course, the union workers are supportive of this project **because they don't live here**. Simple as that.

**From:** Patrick Leiva <pleiva@yahoo.com>  
**Sent:** Monday, July 22, 2024 5:29 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Proposed Koi Nation Casino

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

Hello Mr. Broussard,

I am writing this on behalf of my family living in Larkfield and several neighbors who also have the same opinion on this project.

We strongly reject the idea of dropping a casino on our semi-bucolic lands at the detriment to our way of life and peace for the benefit of a hundred or so persons, not native to this particular area. Why do we need another Casino?

Why should our infrastructure roadways, nature, serenity, and beautiful area be forced by the Federal BLM and government administrators to cede our peaceful existence to these reservation shoppers? I worked at the Graton Resort Casino in their IT and Communications Department as an Engineer when we first brought it online. I can't think of one positive thing to say about these monstrous enterprises that exist to fleece the foolish under the banner of "entertainment" to the detriment of the community they drop into. Have we no redress? Or does our country allow these people to ram this down our throats even though we are many homeowners, business owners and long time residents? As I have read, all our relevant Federal and State representatives back us up in opposing this decision. Please notify the powers that be that we are opposed to this use of lands.

Patrick, Michelle, Victoria and Blake Leiva  
707-592-9731

Sent from my iPhone

**From:** BRETT GRIPE <brettlyg@aol.com>  
**Sent:** Monday, July 22, 2024 10:53 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Koy Casino

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Mr. Broussard:

I am not in favor of any Casino being built on the land being considered. it does not fit with the area, the residences near by, and the traffic flow. There must be a better place. I believe it will cause a big disruption to the way of life of that neighborhood and bring down the value and enjoyment of that nature filled area. Many people in the north zone there are opposed to that development. Please Don't let it happen.

Thank you

Brett Gripe

23 July 2024

PACIFIC REGIONAL OFFICE

2024 JUL 26 AM 11:36

Amy Dutschke

Regional Director

BUREAU OF INDIAN AFFAIRS

Bureau of Indian Affairs, Pacific Region

2800 Cottage Way

Sacramento, Ca. 95825

Dear Ms. Dutschke,

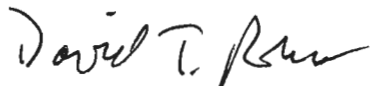
**Re: DEIS Comments, Shiloh Resort and Casino Project**

I am writing to state my objections to the location of the proposed Shiloh Resort and Casino Project, which would be sited about two miles from my house. I am sure you have read plenty of letters opposing the project, and so I will not restate all of the reasons that people find the project objectionable. My wife and I will be most affected by the increased traffic and by light pollution. I agree with the signs that read "No Casinos in Residential Neighborhoods" that are found on many of neighbor's front yards. The project is planned to be placed in a bucolic residential area that fronts upon nearby homes, apartments, and even a church. A casino does not belong there.

I also object to the very idea that an Indian tribe that originates from sixty miles away in a different county can buy a local vineyard and establish a casino, especially when we already have two large Indian casinos in Sonoma County that are fairly short distance apart. The only reason they would favor this location is its proximity to nearby major population centers.

Even though I would still have concerns about increased traffic, I would support the conversion of the vineyard into affordable housing. We need more housing in Sonoma County, not more casinos.

Sincerely yours,



David Rohrs

371 Gazania Court

Santa Rosa, Ca. 95403

I38

**From:** Georgianne Boissier <[gboissier@comcast.net](mailto:gboissier@comcast.net)>  
**Sent:** Tuesday, July 23, 2024 12:53 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Cc:** Jim <[jboissier@comcast.net](mailto:jboissier@comcast.net)>  
**Subject:** [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project

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I am greatly concerned about this project and its affects to the people living around the proposed project.

Water wells proposed by the project will deplete the underground water storage that is currently used by the residents and businesses in the town of Windsor during drought years. With water already in short supply, this will exacerbate the issue.

Traffic will greatly impact the current residents. The current infrastructure has already been maxed out. Traffic in the area, especially during peak hours, is already intolerable. The proposal for mitigation is not sufficient to alleviate the problem. Also, the project is not funding the bulk of the improvements needed. We, the taxpayers, should not have to fund the infrastructure projects that are proposed.

If we have to evacuate due to fires, there will be no way to get out. This is an extremely concerning issue and it was not addressed.

Although noise and light pollution are addressed in the proposal, the actions will not eliminate the increased light and noise. We, as residents, should not have to be subjected to the increased light and noise pollution just for the sake of making money for a few members of the KOI tribe.

A casino does not belong in a residential area. I realized that the KOI tribe does not have the resources to purchase an alternate site, however, that should have been considered before purchasing the property on which they propose to build a casino.

We have parks, a school, a church and homes here. A casino does belong.

Regards,

Georgianne Boissier

**From:** Stevie Lazo <[sjlazo@comcast.net](mailto:sjlazo@comcast.net)>  
**Sent:** Tuesday, July 23, 2024 1:10 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] Casino

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[illegible]

Please do not let this abomination happen. We don't need a casino in a residential and park area. I beg of you do not spoil this beautiful neighborhood for the love of money. It's the root of all evil!

**SJLazo**  
Larkfield, Santa Rosa, CA

Sent through the blue nowhere

**From:** Charlene Bowman <bowmancharlene@att.net>

**Sent:** Tuesday, July 23, 2024 1:32 PM

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

**Subject:** [EXTERNAL] Koi Casino in Windsor

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

Dear Mr. Broussard.

All my neighbors and myself oppose the proposed casino on Old Redwood Highway/Shiloh road. This is **WRONG** for the area and would be a disaster under any evacuation situations. We cannot support a business of this type: extreme water usage, noise, traffic and complete intrusion in this area.

If you have a petition against this development, I will gladly get a huge amount of signatures.

No on the Casino!

Charlene & Charles Bowman

84 Larkfield Dr.

Santa Rosa, Ca. 95403

**From:** YVONNE ESCHENHORST <esch@comcast.net>

**Sent:** Wednesday, July 24, 2024 12:01 PM

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

**Subject:** [EXTERNAL] EIS Comments, KOI Nation Shiloh Resort and Casino

**I41**

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

**To:** Chad Broussard  
Environmental Protection Specialist

We wish to vote to reject this casino project. **It is NOT the right place for a casino.** This casino would place and unnecessary burden on this residential community.

Having gone through the fire evacuations here in Windsor, the roads were so congested that it took us over 2 hours to get to Highway 101.

Having the casino here would only add to the road congestion and difficulty to evacuate.

Our water usage has been limited and having all the excess bathrooms and water needs in the casino, would add to our limitations and cause a further restriction to this area.

Casinos are noisy and may cause threats to our safety with likely need for police patrol and enforcement due to crime.

Because of the needed lighting around the casino, it will no doubt cause housing around the casino unnecessary stress and will disturb their rest.

This casino will strain our public services and funding. They will be destroying a perfectly green space that is there now with the grape vines and the area will add to the high density housing and stores that is now being built on Shiloh and nearby.

We have been a quiet, safe community with families and up until now are been forced to endure all this rapid growth and disruption.

Please seek another open area further North for this project. There is lots of open land with no impact on residential homes and families.

Thank you.

Fred and Yvonne Eschenhorst  
151 Moll Drive  
Windsor, Calif. 95492

**From:** Laurel Jew <lmj.talk@gmail.com>  
**Sent:** Wednesday, July 24, 2024 6:21 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Koi Nation Casino

I42

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

I am writing on behalf of my family living in Larkfield and many neighbors who also have the same opinion on this project. We strongly reject the idea of dropping a casino on our semi-bucolic lands to benefit only a few who are not even native to this particular area!

Furthermore, why does our County even need another Casino? Enough!! Why should our roads, water, electricity, and also our natural, serene beauty be **\*forced\*** by the Federal BLM and government administrators to give way to these solely-for-profit reservation shoppers with their crime, traffic, invasive lighting, and the additional stress on housing and other services? Have we no redress? Do unelected bureaucrats run our country and ignore the united opposition of those who will have to live with this abomination?

We are many homeowners, business owners, and long time residents—and yes, even renters, who still struggle with a housing shortage and inflated costs from the fires of 2017 and 2019. All our relevant Federal and State representatives back the local residents up in opposing this decision, as do our unanimous County Supervisors. Please reconsider and pursue a more appropriate use of this recently purchased land. Dollars and lobbyists should not be the deciding factor here, but rather the strong feelings of those who would have to live next door. The nation is for all of us.

Sent from [Mail](#) for Windows

July 25, 2024

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

Sent Via Electronic Mail to: [chad.broussard@bia.gov](mailto:chad.broussard@bia.gov)

**RE: Community Support for the Koi Nation of Northern California's Shiloh Project**

Dear Ms. Dutschke:

The Nor Cal Carpenters Union is submitting this letter to the United States Department of the Interior's Bureau of Indian Affairs to emphasize the benefits that we believe the Koi Nation of Northern California's ("Nation") Shiloh Project will bring to the Town of Windsor and the Sonoma County area more broadly. We are in favor of the Shiloh Project, not only because it is projected to create many jobs for the community, but also because it is the product of thorough research that thoughtfully considered community concerns, such as those relating to wildfire hazards, emergency evacuations, and water usage.

The Nor Cal Carpenters Union has a membership of over 37,000 skilled craftspeople, making us one of the largest organized voices in the Northern California construction industry. This project will provide family supporting union jobs with benefits including healthcare and pensions to hundreds of our members who live in and around Sonoma County. The project also will provide Sonoma County residents with the opportunity to obtain training in a skilled trade, one that can provide them with the same solid economic future that this project offers to the Koi Nation. According to the Environmental Impact Statement ("EIS"), the Shiloh Project is projected to create an estimated 1,609 full-time equivalent jobs during the construction period and an estimated 1,571 full-time equivalent jobs during the operation of the Shiloh Project. This creation of jobs would serve as an important economic driver in the Sonoma County region, thereby benefiting many families and individuals who are currently seeking work.

It is also our belief that the Environmental Impact Statement was well-written and earnest in its consideration of the existing Sonoma County community. It is clear to us that the EIS reflects the Nation's commitment to addressing the issues of highest concern in the community with real sensitivity. Namely, we feel that the mitigation measures put forth in the Environmental Impact Statement thoughtfully addressed the wildfire and water management concerns raised by the community in public hearings and submitted written comments.

The Environmental Impact Statement demonstrates the Nation's understanding of the region's wildfire history by assuring the community that fire protection services will be provided, whether by the Sonoma County Fire District or by the Nation itself through the establishment of an on-site fire department that would be staffed with sufficient personnel to provide fire protection and emergency medical services for three shifts every day. Similarly, the EIS pledges to reduce fire risks during both the construction and operation of the Shiloh Project.

The Nation also took seriously the community's concerns regarding increased evacuation times and proposed multiple measures that would use expert advice to generate wildfire management and emergency evacuation plans. These measures, in addition to employee training and coordination with Sonoma County and the Town of Windsor, will serve to minimize wildfire risks.

Throughout the public comment period, the community also raised concerns relating to groundwater resources. Much like wildfire risks, groundwater depletion is a concern that has existed in the area prior to the Nation's Shiloh Project proposal. The Environmental Impact Statement's discussion of water resources illustrates the Nation's genuine desire to assuage the community concerns by walking through aspects of projected water consumption and the minimal impacts related to it under the Nation's implementation of best management practices. Where the EIS does detect cumulative effects on groundwater resources, it also proposes three extensive mitigation measures based upon the needs of the Town of Windsor that would allow the Nation to implement monitoring programs to rectify such issues.

The Environmental Impact Statement addresses many other concerns raised by the community with the same sensitivity and thorough research as it does for wildfire hazards and water resources. If the Shiloh Project is approved, we wholeheartedly trust the Nation to continue to listen to and genuinely consider the comments and concerns of the surrounding community. In doing so, we are hopeful that the Shiloh Project will serve as an impetus for economic prosperity in the region.

Please contact our office with any questions you may have regarding our support.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay Bradshaw", with a long horizontal flourish extending to the right.

Jay Bradshaw  
Executive Secretary-Treasurer  
Nor Cal Carpenters Union

PACIFIC REGIONAL OFFICE

2024 JUL 29 AM 11:11

BUREAU OF INDIAN AFFAIRS

Susan T. Standish  
817 Monroe Street  
Santa Rosa, CA 95404  
July 26, 2024

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

re: ~~NEIS~~ Comments, Shiloh Resort and Casino Project

Dear Madam:

The proposal is for an enormous casino with 2,750 gaming machines, 5 restaurants, 5 bars, a coffee shop, a 2300-seat event center, 2 ballrooms, plus an adjacent 400-room hotel and spa, and over 5,000 parking spaces. That's huge!

Sonoma County, which is not one of the most populated areas in the country, already has two huge casino complexes. We do not need more. Why cannot the Koi Nation design a development that is more in keeping with the lifestyles of the people surrounding the area? Native Americans need more than gambling on which to base the development and prosperity of their people. Gambling has become the "easy way out" and actually limits the opportunities for employment and security for their people, who have demonstrated their intelligence, strength, and morality many times over. They can do better than this. Educational or medical facilities? Native crops, which are becoming more and more popular for consumers? Housing with cultural centers and schools? Well-designed factories to produce products for modern needs, with family support for their workers? Global warming is opening the door for such products..

Please turn to the intelligent, well-endowed, visionary people like Bill and Melinda Gates or Warren Buffett and see what the future could hold. The future must offer more than the law of chance and greed or we are all doomed. Show us the way.

Yours truly,



**From:** Hollis Stavn <hlstavn@sonic.net>  
**Sent:** Friday, July 26, 2024 4:21 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] "EIS Comments, Koi Nation Shiloh Resort and Casino"

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

I am an optometrist in Santa Rosa and have lived on Carriage Ln in Larkfield since 1990 or 34 years.

I oppose any casino development in this area as does all the local politicians and all of my neighbors and the other local tribes. There are plenty of reasons.

This would essentially destroy the bucolic semi rural peace and value of this area for a casino that should not even qualify to be here.

This is the rudest most thoughtless craven proposal by gambling interests imaginable in an area where they are fully aware they are not welcome. First they should elicit approval from their neighbors not a unwelcome hostile takeover that would forever change the nature of and future of the surrounding communities in deleterious ways. That should be enough however there are also other good reasons not to approve this.

1. Water Use: This area has been in a long term, near perpetual drought for the last 15 years that have required us to restrict our water use most of the times for many years in what has been called a hundred or thousand year drought. With climate change this is likely to continue. There is not enough water in times of drought for this project. Where is the water to come from? Will it impact residents, farmers, industry, or grape growers. Will it change the nature of our rivers with more use and increased pollution. Will it affect our health?

2. Traffic: Will this impact traffic entrance and exit and travel times on 101 which is already stressed both north and south of Santa Rosa. With a hospital near by will it impact response times for emergency services/ Will it impact commuters from Windsor to points south. There is a business park west of the freeway that has about 50, 000 people there.

3. Will the increased traffic and congestion on the roads impact air quality and asthma levels nearby. San Miguel School is nearby.

4: Will this impact the sky with tremendous light pollution.

5. Fire danger: This community has been impacted by 3 recent catastrophic fires right in this local area. We have had fires in Windsor and Healdsburg. We now have one in Chico. My house 2 times was attacked by fire once 300 feet away in 2 different directions. Being at the bottom of the Wikiup hill I witnessed in 2017 people fleeing down the hill running from the fires. I joined them and not knowing where to go I headed to Santa Rosa which took nearly 4 to 5 hours to reach. There is no way whatsoever in another situation like this that the infrastructure here would permit escape, if it were more crowded people could die.

6: Crime: Who would be responsible for paying for capture and prosecution of crime in the area?

7: This area is a residential and agricultural area. IT has never been zoned for a casino. This would change in a big negative way the entire nature and quality of life of every person that lives here. It would impact

light pollution noise pollution travel times response times water quality air quality crime and safety for every person who lives here. The locals are strongly against this. The only people who wants them is gambling interests from foreign places let along this attempt is off the reservation so to speak they are not from here. Just the risk of people attending the casino smoking cigarettes and throwing them out a car is an unacceptable risk. There are so many reasons to deny his casino that make common sense. Please consider the wishes of the people who have made this their home. This is serious upsetting and outrageous.

Sincerely, Hollis Stavn, 5675 Carriage Ln Larkfield 95403, 707-480-3573,  
[hlstavn@sonic.net](mailto:hlstavn@sonic.net)

**From:** Lesley Alexander <lellya@comcast.net>  
**Sent:** Sunday, July 28, 2024 8:56 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

**I46**

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

No Casino In our Residential Neighborhood.

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

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

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

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

Where will the water come from?

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

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

Respectfully,

Lesley and Jerry Alexander  
136 Anna Drive

**From:** Annette <flachman@sonic.net>  
**Sent:** Sunday, July 28, 2024 9:45 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS comments, Koi Nation Shiloh Resort and Casino

I47

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

I am writing to you in opposition of the proposed casino by Koi Nation. Koi Nation's original homeland was in Lake County, their roots are in Lake County, not Sonoma County. They should not be permitted to buy property in Sonoma County, or anywhere else for that matter, and turn it into their homeland, especially not for the purpose of opening a casino. Just because they bought the property, doesn't mean this is the right place for a casino. The property they have purchased in Sonoma County is literally across the street from a residential community near Windsor. A casino at this location will destroy property values for families who have worked hard to buy homes in the area and create a community with children, schools, churches, parks, etc. This is a family oriented community with no place for a development like a casino.

Additionally, we have spent three years in a severe drought situation and while we are temporarily out of the drought, it will return. Building much needed additional housing that will add to the strain on our water supplies is necessary. Building a casino that will strain the infrastructure serves no purpose to better our community. Aside from that, in 2019 our entire town was evacuated due to the Kincadee fire. It took over an hour to drive seven miles from Windsor to Santa Rosa because there were so many cars on the freeway with people and animals evacuating from our homes. Because of the quick action in evacuation, **NO ONE DIED**. Adding thousands more cars to this scenario would certainly mean people would die while trying to escape the flames, much like people died in Paradise, CA trying to escape the Camp fire in 2018. Our six lane freeway (101) runs north/south. If we had to flee east or west, there is no good way to go. Most east/west highways are two lane. People trying to flee the Oakmont, Kenwood and Sonoma areas during the many fires in 2017 or the Glass fire in 2020 faced gridlock on those two lane roads putting many lives in danger. Putting even more cars on those roads during an emergency evacuation means lives would certainly be lost. For a casino.

Finally, before making a decision on the casino issue, you should be required to come and take a tour of the area. Not an hour or two hour drive through, but spend a day or two in the area and see what a special place this is and why a casino would destroy the ambiance of this community, this town and this entire area. An environmental impact report doesn't tell you how a casino in that location would effect our entire way of life. Please deny the approval for the Koi Nation proposed casino. It does not belong in our area.

Thank you.  
Annette Flachman  
9557 Kristine Way  
Windsor, CA

**From:** Allan Cory <allanjcory@gmail.com>  
**Sent:** Sunday, July 28, 2024 9:50 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] No on the Proposed Koi Nation Casino

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Establishing yet another gaming facility, while possibly equitable in nature, will saturate the County of Sonoma and transform it into some remote adjunct of Nevada—we must stop encouraging or enabling the citizens of one agricultural county to serve as the Bay Area's gambling hub.

The local gaming tribes have never put any serious effort to "reservation shop" for a location within our neighboring Marin County, a destination closer to the majority of the largest Bay Area population centers. Moreover, allowing yet another Sonoma County casino pits the very tribes who are seeking equity against each other. Don't make Sonoma another Oklahoma by squeezing all the tribal gaming facilities into one geographical area: If yet another casino must be built, then please look southward to Marin.

s/ Allan Cory

**From:** ROBERT WICHTOWSKI <porscha356@aol.com>  
**Sent:** Sunday, July 28, 2024 10:33 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS comments, Koi casino project in Sonoma County

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Dear Mr. Broussard,

Wow! Things are getting out of hand in Sonoma County and environs with all the casinos. It seems the Bay Area descends on us during the summer and weekends. Not only tourists are attracted to the magic lure of gambling, but the low life underbelly that inevitably follows in its ignominious wake. When I read the crime stats in the Press Democrat on a daily basis, the list of out of town names busted for drunk driving, theft, smash and grab and other assorted bad behavior stands out. Not to mention the increased traffic, congestion and degradation of our community. We REALLY don't want another casino here! We voted to allow casino style gambling on what we thought was Tribal reservation land only. However, it has now morphed into land that has been purchased by the tribe in any available real estate parcel. The typical procedure is the tribe buys a large piece of land, presumably intended for "housing", thus sneaking it past residents and county supervisors. Then, magically, it becomes reservation land and the future home of another crummy casino. This is the modus operandi oft repeated around here. It is high time to say "nyet" to this subterfuge and nix this current monstrosity in Windsor.

Sincerely,  
Bob Wichtowski  
Liz Fisher  
Sebastopol, Ca

Sent from my iPad

**From:** Norman Vachon <[normanvachon0@gmail.com](mailto:normanvachon0@gmail.com)>

**150**

**Sent:** Sunday, July 28, 2024 5:14 PM

**To:** [singer@singersf.com](mailto:singer@singersf.com) <[singer@singersf.com](mailto:singer@singersf.com)>; Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>

**Cc:** [towncouncil@townofwindsor.com](mailto:towncouncil@townofwindsor.com) <[towncouncil@townofwindsor.com](mailto:towncouncil@townofwindsor.com)>

**Subject:** [EXTERNAL] EIS Comments Koi Nation Shiloh Resort and Casino

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

EIS Comments Koi Nation Shiloh Resort and Casino

My wife and I along with our family and the friends we have spoken to are in opposition to construction of another casino in Sonoma County and specifically Windsor, CA

The reasons for opposition are as follows:

1. The casino is adjacent to a residential neighborhood and it is proven that noise, traffic, and crime will increase..
2. Traffic which is already at a standstill during commute hours will be worse.
3. There are already two casinos in Sonoma County with a short drive to each one. That's 3,900 existing slot machines, Another 2,750 gaming machines are not needed.
4. Sonoma County is already challenged to fill its multitude of restaurants, spas, and event centers. Adding another 5 restaurants, 5 bars, and 2 more event centers will only redistribute the money from the existing business to the casino.
5. The effect on crime may be low when the casino opens and it grows over time.
6. Windsor is considered by most folks as a bedroom community that is safe for large gatherings and it is quiet at night. Many people live here for this reason. Taking away the bedroom community charm and safety is not what the residence bought into.
7. Adding a 400 room hotel does not mean the rooms will be filled with new visitors. Rather the existing 60% occupancy rate for Sonoma Hotels will decrease causing greater hardship for the existing hotels.
8. We know that casinos can be addictive to some people, which leads to financial and emotional problems. Since the house wins most of the time in a casino, then encouraging people to lose their money in a casino weakens nearby businesses, hurts property values, reduces civic participation and family stability. We support the Koi Nation to prosper, however not with a casino. The Koi Nation Indian tribe needs to come up with a better idea to make money than in a casino.
9. The only tribes that support the casino are not in Sonoma County and they have no interest or care for the people living in Windsor.
10. Sonoma County is known for the wineries, parks, and open space. We don't want to be identified as the "Gambling County".
11. The quality of life in Windsor will go down, not up with another casino.

Please do not build of the Koi Nation Casino Project.

Thank you,  
Norman and Sohier Vachon  
8761 Merlot Way Windsor, CA

I51

**From:** tkyrk@aol.com <tkyrk@aol.com>  
**Sent:** Sunday, July 28, 2024 6:57 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Please No Casino!

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

Hello Chad,

I am a long-time Windsor resident and I strongly opposed this casino.

Here are the reasons for my opposition:

Traffic congestion, water consumption, fire evacuation, crime.

Graton Casino is only 15-20 minutes away. Casinos to the north are 30-45 minutes away.

We don't need this in our relatively small town.

Please, NO!

Thank you, Tina Kyrk

**From:** Barbara <bcoen@sonic.net>  
**Sent:** Monday, July 29, 2024 11:00 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project

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Please add my name to those neighbors who oppose this project for the many reasons already articulated...

Traffic concerns  
Fire and evacuation concerns  
Oversupply of similar projects in Sonoma County

Thank you,  
Barbara Coen  
411B Las Casitas  
Santa Rosa, 95403

**From:** RandomMuse <[RandomMuse@protonmail.com](mailto:RandomMuse@protonmail.com)>

**Sent:** Monday, July 29, 2024 11:43 AM

**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>

**Subject:** [EXTERNAL] Koi Casino: Economic Predation & Aesthetic Abomination

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

Sir,

The Koi Nation casino does not belong in Windsor, California. There are already too many casinos mind Sonoma County; casinos are economic predators and they do not belong everywhere. Casinos are weapons of cash reduction; stop using economic predation to support Native Americans. Also, the planned casino is directly across the street from Shiloh Regional Park, a very beautiful, scenic and wild spot in Windsor.

Brent Gudzus  
Windsor, California

**From:** Randall-Greenwood, Leslie A <Leslie.Randall-Greenwood@sutterhealth.org>  
**Sent:** Monday, July 29, 2024 1:03 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Cc:** Leslie Greenwood <mljrgreenwood@comcast.net>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

154

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

Hello,

I am writing to express my **strong opposition** to the proposed casino project at 222 East Shiloh Road in Windsor, California. The project is completely inappropriate to be constructed at the proposed site.

The site is zoned by Sonoma County as (LIA) - Land Intensive Agricultural use and is currently used for agricultural purposes and should remain that way.

The site is adjacent to a low density residential area that has limited lanes for traffic to move into and out of the neighborhood. The impact to the local environment that would result from the construction of the proposed project would be **significant**. The impact to ground water, air quality, traffic, noise, safety (for local residents and casino/hotel guests), waste water, sanitation, etc must all be considered. It is impossible to believe that a business at that location that that operates 24 hours per day, with 5,000 parking spaces, a 2,800 seat event center, hotel, casino, multiple restaurants, and 1,100 employees would only create a "less than significant impact" on the surrounding area.

A review of Appendix A, the "Off Reservation Environmental Impact Analysis Checklist", has left me with serious concerns about the accuracy of the report and whether the true environmental impact to the proposed site and the surrounding areas have been studied.

The Koi Nation say their culture is to honor the land but the proposed project does not honor the land at the proposed site or the surrounding area.

**I am OPPOSED to the large scale casino project at the proposed site at 222 East Shiloh Road, Windsor, California. This casino project needs to find a more suitable site.**

Thank you,  
Leslie Randall-Greenwood  
Unincorporated part of Sonoma County Santa Rosa Resident

**From:** John Beilharz <[johnwbeilharz@gmail.com](mailto:johnwbeilharz@gmail.com)>  
**Sent:** Monday, July 29, 2024 3:28 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] EIS Comments- Koi Nation Shiloh Resort

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

Chad Broussard  
Environmental Protection Specialist  
Bureau of Indian Affairs, Pacific Region

RE: EIS Comments- Koi Nation Shiloh Resort

Dear Mr. Broussard,

As a long-time resident of Sonoma County for over 45 years and a former member of the Santa Rosa Chamber of Commerce Board of Directors, I have witnessed significant growth in our region—both positive and negative. One particularly concerning development was the construction of Fountain Grove, a hillside community that unfortunately burned down completely in the Tubbs Fire, despite prior protests about its vulnerability due to a similar fire 30 years earlier. This experience underscores the importance of carefully evaluating new projects, such as the proposed casino by the Koi Nation. I would like to express several critical concerns regarding this proposal:

1. **Traffic and Accessibility:** The proposed site is accessible via a single road, which poses a severe risk during emergencies. This limitation could lead to dangerous and potentially life-threatening situations, as evidenced by the recent evacuation challenges during the fire.
2. **Water Consumption:** The scale of this project raises significant concerns about water usage. We have recently experienced both drought conditions and a temporary reprieve with rainfall. Given the likelihood of future droughts, the water demands of such a large-scale development could exacerbate our existing challenges.
3. **Existing Casino Proximity:** We already have well-established casinos located just 10 minutes to the north and south of the proposed site. Adding another casino seems redundant and unnecessary. This proliferation could ultimately lead to an oversaturation of the market and detract from the unique character of our community.
4. **Community Impact:** The proposed location is adjacent to neighborhoods and parks frequented by young families. Replacing a beautiful vineyard with a large casino could significantly alter the character of the area and disrupt the surrounding community. Additionally, there are concerns about the potential negative social impact associated with increased gambling activity.
5. **Employment and Construction Challenges:** While the project proponents claim it will create numerous jobs, there is already a severe shortage of available contractors due to ongoing reconstruction efforts from previous fire damage and housing shortages. This raises doubts about the feasibility of fulfilling the employment promises made.

I strongly believe in supporting Native American communities and advocating for meaningful reparation. However, this casino project appears to be a misguided approach. Instead, I would advocate for initiatives that provide comprehensive healthcare and educational opportunities to Native Americans, rather than supporting business ventures with large commercial entities. I urge you to carefully reconsider this proposal. The potential risks and adverse effects on our community are substantial and warrant a thorough review before any decisions are made. Thank you for your attention to this matter.

Sincerely,

John Beilharz, Ph.D

**From:** MARY HESS <mtnmusic@att.net>  
**Sent:** Monday, July 29, 2024 3:39 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] A letter AGAINST the projected Shiloh Resort and Casino Project

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Hello Chad,

I am writing once again to urge denial of the building of the proposed Shiloh Resort and Casino. I know you have heard the following arguments before, but you and those who are manipulating this situation do not seem to be taking these seriously. All for gain for a few - a reparation attempt that is badly misplaced.

The relative open space between Larkfield/Wikiup and Windsor is a necessity to keep as open space for several reasons.

- 1) The traffic impact will be several times greater for the entire area. Old Redwood Highway is a commuter corridor, particularly during the school year. Traffic will be horrendous for the residents from Windsor to Larkfield.
- 2) In this day and age of climate change, I know many people who cycle along Old Redwood. Cars and bicycles do not mix well.
- 3) Having lost my house in the Tubbs Fire, I am terrified of the traffic jams that will happen when the next fire roars through the area.
- 4) The added traffic will force many residents and casino-goers to use Faught Road which is narrow, curvy, and runs past an elementary school. I, as a cyclist, will be taking my life in hand when speeding and possibly drunk drivers go past.
- 5) Shiloh Regional Park and the wildlife therein will be impacted by the proximity of yet even more buildings in the area, parking lots, car parks and all the ugliness that attends complexes such as these.
- 6) Gambling is a tax on the poor. It is a social evil.

Please remove these plans far way - like back in Lake County where this tribe originates.

Best regards,  
MARY HESS

**From:** susan albritton <[smalbritton@sbcglobal.net](mailto:smalbritton@sbcglobal.net)>  
**Sent:** Wednesday, July 24, 2024 11:17 AM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] Koi Nation Casino

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Dear Sir,

I am writing to inform you that I strongly reject the idea of building a casino in the Windsor/Larkfield area.

I question the idea of destroying a peaceful semi- country area of land and disrupting the lives of so many in the area just to benefit a relatively small number of people that are not even native to this area. This area of Sonoma County (Windsor) is already being inundated with business and low cost housing construction (though I strongly agree about the low cost housing). Our roads are in dire need of repair,. The traffic is already, both on the surface roads as well as 101, unbearable and this is before the completion of the low cost housing.

In addition, there are already two casinos in nearby areas, do we really need a third? NO. Let's be real, these casinos do not always attract the nicest of people, consumption of alcoholic beverages is encouraged (the drunker the player the more money they are willing to lose) which in turn puts more drivers under the influence on the road. The proposed casino will be in the vicinity of schools and a public park, we all know that there is a lot of drug dealing going on around these casinos. Gambling ,while it is a choice, is destructive to so many families.I know of a family that was living out of their car after losing all their money repeatedly at Graton. They were sleeping in the parking lot at Graton leaving their kids in the car while they gambled. These casinos are a blight on our community.

It is time to stop the destruction of family oriented communities and block the construction of this casino.

Sincerely,  
Susan

Albritton

From: rldabney@sonic.net <rldabney@sonic.net>  
 Sent: Monday, July 29, 2024 4:34 PM  
 To: Broussard, Chad N <Chad.Broussard@bia.gov>  
 Subject: [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project

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Greetings,

I have concerns about the environmental and quality of life impact of the casino project.

My residence of 31 years is within 500 feet of the proposed project, and it will be directly visible to me.

The following concerns may have been addressed by the proposed mitigation section of the DEIR, however since the wording of the mitigation section says "proposed" and not "required" I have included all that concerns me.

- Safety, fire and earthquake - Adding a significant number of cars and persons to an area where fire evacuation has already proven to be problematic (ie Tubbs Fire). Since that fire, several hundred apartment units have been added to the immediate area, and all will rely on Shiloh Road and Old Redwood Highway for a safe escape. Both roads were slow bumper-to-bumper during the mandatory evacuation orders. One only need to look at how Coffee Park was affected, where cars were left abandoned to burn when the roads became too congested to safely escape. One cannot expect the visitors to the Casino to have any idea about safe evacuation procedures, thus putting all at risk. Evacuating the cars from the recommended 5,119 parking spaces would be impossible in a timely and safe manner.
- Safety, law enforcement- It is noted that the Sonoma County Sherrif and other agencies will contract to provide services. Nowhere is it specified that the various agencies will increase in size so as to not dilute services that are already stretched thin.
- Safety, impaired driving- There is a park immediately adjacent to the project visited by kids and families on a regular basis. One can assume that a significant number of drivers leaving the project have had some amount of alcohol consumption. This is putting kids directly at risk. There is a regular use of the bike lanes on Shiloh and Old Redwood (myself included). The casino puts us all at risk with increased traffic and a high potential (certainty) of impaired driving.
- Noise, traffic- The report goes into great detail about noise measurements and methods. All of the expected noise levels are predictions and not guarantees. I would submit that the noise predictions do not take into account the increased noise from vehicle acceleration exiting after an event. Delivery truck noise is mentioned, though time-of-day is not factored in. Most deliveries of food items are performed in the early morning in refrigerated trucks. Not only does this spike the noise at that time, the refrigerated trucks have high mounted engine driven cooling units which are easily heard at great distances. Busses are often left to idle for extended periods, adding to the noise levels.
- Noise, events - In addition to a spike of vehicle traffic during ingress and egress to an event, loud music is likely to be an issue. Mid and high tones can be somewhat attenuated with properly engineered buildings, low tones are unlikely to be contained. Everyone has been next to a car where the bass line reverberates through your car and is impossible to ignore. There is no mention in the report about continuous monitoring of emitted noise, nor the enforcement of the relevant noise standards should the sound levels be exceeded.
- Environmental, rainwater runoff - A 5000+ parking lot will have a significant runoff into Pruitt creek. What will mitigate flow of oil, tire rubber and trash into the creek? How will this be monitored and enforced?
- Environmental, air quality - High density of traffic idling after an event during egress, in addition to idling busses.
- Water usage from wells - This is a great concern to my neighborhood. We are dependent on out private wells, most being about 60' in depth. The report only predicts the drawdown based on the estimated water use. A prediction based on an estimate is not much comfort. Water usage over time never decreases due to additional needs, equipment degradation, poor or deferred maintenance and leaks. If water usage monitoring is to be done to enforce compliance, what will be the actions taken? Fines? What if my well goes dry? I can't afford to have municipal water installed. Will the fines pay for that?
- With the amount of money already spent on the project by unknown investors who live nowhere near the project, I'm concerned that the approval of a casino is a foregone conclusion, and any input by those most affected is meaningless. I hope that I am wrong.

Thank you for your time to consider my concerns.

Rick Dabney

**From:** Laurence Bartone <[bartonioni@gmail.com](mailto:bartonioni@gmail.com)>  
**Sent:** Monday, July 29, 2024 4:37 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] Indian casino thoughts

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Hi, Chad. I felt compelled to add my two cents here. I moved from LA to SF (Mill Valley) in '70, in large part because I loved the trees, quiet traffic, and overall low profile of Northern California. Much has changed since then, but much of the change was not necessary - nor is it today. Please - no more big box stores, condo developments, and especially the (unnecessary) casinos. They're not needed for housing, farming, or anything else but profits, and that just doesn't fit with N. California.

My two cents.

Laurence Bartone

**From:** Wendy Fowler Nunes <[wenz@nunesvineyard.com](mailto:wenz@nunesvineyard.com)>  
**Sent:** Monday, July 29, 2024 4:39 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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Chad Broussard  
Environmental Protection Specialist  
Bureau of Indian Affairs, Pacific Region  
[Chad.broussard@bia.gov](mailto:Chad.broussard@bia.gov)

**EIS Comments, Koi Nation Shiloh Resort and Casino**

Our house is next to the church on Old Redwood Hwy and behind Groom bus maintenance facility. Our 46 acre vineyard, (with small winery and distillery) runs between our driveway on Old Redwood Highway and Hwy 101. Being this close to the proposed casino development will affect us in a large way. We are family owned and operated since the middle of the last century. Here are some of our issues.

1. **Location** – It's in the middle of a mostly residential area. This area has grown around us over the years.
2. **Traffic** – One of the main entrances is across from our driveway. It's already hard to navigate onto Old Redwood Hwy. During the Tubbs Fire, it was essentially impossible.
3. **Flooding** – This site floods. Pruitt Creek runs through the middle of this vineyard parcel, then under Old Redwood Hwy where it backs up with every good sized rain storm before flowing across our vineyard. We've been watching it flood this land for many years. Our vineyard also floods, and it gets worse every year as land is built up around us. This development in particular, because of the large size of it and the amount of pavement, will dump even more floodwater downstream onto us and our neighbors.
4. **Water** – Five wells, new ones at 700 feet? What happens to those of us with wells around these? We operate with one agricultural well and one small domestic well as we have since the early 1950's, neither of them near that depth. How will our wells be affected?
5. **Zoning** – Intensive Agriculture. This is not compliant.
6. **Sewage** – A 3.5 acre sewage treatment plant that discharges effluent into Pruitt Creek. How will this affect the vineyards and homes when the creek floods?
7. **Earthquake fault** – couldn't be closer.
8. **Aesthetics** – The rendering shows a huge boxy building that dwarfs everything around it, and we'd be looking at the back edge instead of the hills we are used to seeing.
9. **Community** – Do we really need another casino? It doesn't seem like the other casinos in the area are that busy as it is. And will a casino bring more crime into our rural residential neighborhood?

Of the three proposed plans, the only project that might fit there is the third one, the winery.

Wendy Fowler Nunes (and Frederic J )

I61

**From:** Xavier de la Prade <zavyay@gmail.com>  
**Sent:** Monday, July 29, 2024 5:25 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] "EIS Comments, Koi Nation Shiloh Resort and Casino"

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"EIS Comments, Koi Nation  
Shiloh Resort and Casino"

Dear Mr. Broussard,  
As a resident and voter in Sonoma I feel that two Casinos per County are more than sufficient. When I was younger there were bowling alleys on every corner. The all went bankrupt. The same will happen with Casinos. Moreover, the Miwok were the tribe that lived and were almost decimated here in Sonoma. We should show them some respect and retribution by giving them exclusive rights to their former tribal lands. Please do not let outside tribes come and stake their territory.  
Many thanks,  
Xavier de la Prade  
30 Crickett Court  
Petaluma, CA 94954  
707.769.9880

I62

**From:** Geren Nichols <jgnicholsmd@hotmail.com>  
**Sent:** Tuesday, July 30, 2024 8:09 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments Koi Nation Shiloh Resort and Casino

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As an advocate for environmental protections for the communities, flora and fauna of Sonoma County, I oppose the creation of an additional and very large footprint casino in the middle of prime habitat in the oak woodlands of Sonoma County.

As a taxpayer I resent the intrusion of a non-native tribe claiming sovereignty in Sonoma County and suggest that the BIA look to Lake County as the true home of the Koi.

As a citizen, I oppose new gaming facilities when we already have sufficient supply in the county. I think the Koi proposal will literally take bread out of the mouths of our own Pomo. Specifically the Pomo of Dry Creek Rancheria.

Please turn down further plans to proceed with this Koi Nation Shiloh Resort and Casino.

Thank you,  
Linda L Fraley, MD  
Santa Rosa California  
559-779-5211

**From:** skcousins <skcousins@hotmail.com>  
**Sent:** Tuesday, July 30, 2024 9:31 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Koi nation Windsor Ca A

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What are they thinking ! Putting a casino in a neighborhood is crazy. Have the people making The decision visited this site . The 12 million they paid  
For the vineyard would be better spent on education for the members. I doubt few of tribe would even be employed here as they live up in lake co.

I64

**From:** Curtis Short <[fun4plants@gmail.com](mailto:fun4plants@gmail.com)>  
**Sent:** Tuesday, July 30, 2024 9:48 AM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] No casino in Windsor.

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There are so many reasons why this casino should not be built; environmental, economic, ethical, aesthetic, safety. The answer is simply no. No casino in Windsor.

Curtis Short  
4223 Flat Rock Circle  
Santa Rosa CA  
707-528-8302

**From:** Lynne Morin <[lynnemariemorin@gmail.com](mailto:lynnemariemorin@gmail.com)>  
**Sent:** Tuesday, July 30, 2024 11:14 AM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] Shiloh Indian Casino Proposal Windsor CA

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I strongly object the a casino being placed in this fire proved area. The tribe is from Lake County (not Sonoma County). There is limited emergency access in case of another wildfire. We have had 4 major wildfires in the past 5 years. The current vineyard serves as a fire break and Old Redwood Highway is a single lane in each direction which was completely backed up during the last fire. People's lives are at stake here. People who have lived here and grew up here. This tribe should build in Lake County where their land is located.

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

**From:** David Gurley <dgurley007@yahoo.com>  
**Sent:** Tuesday, July 30, 2024 11:52 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Cc:** David Gurley <dgurley007@yahoo.com>  
**Subject:** [EXTERNAL] STRENUOUS Objection to Koi Tribe Windsor Casino \*Proposal\*

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Mr. Broussard ~

I am writing to express my profound objection to the proposed construction of the Koi Tribe casino on Shiloh Road, in Windsor, California!

This is a very - **\*very\*** - bad idea.

1. Although **\*very\*** close to huge areas scarred by prior wildfires in 2017, 2019 & 2020, the subject area has not yet burned. As such, it is extremely prone to burning in the near future.
2. When my family was forced to drive through a wall of fire leaving our home between 12:30 and 1:00 a.m. on October 9<sup>th</sup>, 2017, traffic was only an issue when a **\*burning car\*** forced us all into the oncoming lane.

There are only two-lane roads leaving the proposed location, which are also emergency routes for thousands of **\*residents\*** in the immediate vicinity. Widening the road (at the taxpayers' expense) is unacceptable; the added vehicle load of a major facility would undoubtedly result in unnecessary **\*life safety\*** risks to those currently **\*living\*** there.

3. Sonoma County is currently dedicating an inordinate amount of water and resources to its growing number of large apartment complexes. Adding the water consumption inherent to a landscaped, 200 room hotel with six (6) restaurants will **\*add\*** an immeasurable drain on the water resources of the area. Living spaces should absolutely supersede "entertainment" spaces. And we Just. Don't. Have. Enough. For Both....

That's in **\*addition\*** to the immeasurable impact of the wastes generated by those rooms and restaurants. It may be treated on-site, but it's **\*still\*** waste – human, food, recyclable and trash – *it's still \*waste.\**

4. The vicinity of the proposed location – on all sides – is residential. Adding a casino will undoubtedly have **\*negative\*** impacts imposed by 24/7 traffic, noise and light pollution.

**\*PLEASE\*** do not let this project continue! This is our neighborhood! It is my understanding that the vast majority of the Koi Tribe's lands are not even in this area!

Please....

David E. Gurley  
 Windsor Resident  
 415.717.5633

**From:** Tom Schiff <schiff.tom@gmail.com>  
**Sent:** Tuesday, July 30, 2024 12:57 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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We live 2 exits down the freeway from this proposed project. We lost our home in the 2017 Tubbs Fire after escaping just ahead of the fire. We know about no-notice fire evacuations.

Our son's family lives in Windsor.

This project is a bad idea for the neighborhood and local citizens. It will be a safety hazard:

- The access for emergency escape from the area will be overwhelmed. There are already neighborhoods that must use the same road, both up Shiloh and from Old Redwood Highway.
- The regular traffic from such a project will be horrible. I take my grandchildren to their schools using the "Shiloh to Old Redwood Highway" route.
- Parking for "... more than 5,000 vehicles"? From this project alone -- and they are all to use the same road? That dog don't hunt.
- This does not fit in a family neighborhood area.
- This land is located far outside any former tribal land. It's not contiguous, it's not even remotely close or connected. It was not and is not within any sphere of influence if that's the right term.
- It is totally out of character for the area and neighborhoods.
- The neighborhood immediately adjacent will be inundated in night lights.
- How many casinos does a county need? Not this many.
- The fact that this project "snuck into town under the cover of darkness" says it all.

I strongly oppose this type of usage in this area. The increased risks for a catastrophic event are enormous. I've seen one such event up close and personal. I don't want to see others face that situation.

(Aside from barely making it out of our house, we were the first car on the 101 freeway when the CHP stopped all traffic and turned it around on the freeway due to the fire crossing the freeway like a blow torch.)

\*\*\*\*\*

Thomas E. Schiff  
 3930 Hansford Court  
 Santa Rosa, CA 95404  
 (714) 745-1360

**From:** Francois Jerins <fjerins@sbcglobal.net>  
**Sent:** Tuesday, July 30, 2024 1:39 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Casino on Old Redwood and Shiloh

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This is one bad idea. Imagine the traffic jams? First Responders? The costs of widening the roads? Who will pay for all of this? This tribe has tried to do this at the Oakland airport and it failed. I say HELL NO!!!! The Indians are not from Sonoma, they are from Lake County. Let them build it there but not here. This will bring crime into our area. It will have a major impact on our water resources and emergency services. This is no place for this boon dongle. NO NO NO.

Francois Jerins  
1018 Foothill Drive  
Windsor, CA 95492

**From:** Francois Jerins <fjerins@sbcglobal.net>  
**Sent:** Tuesday, July 30, 2024 1:39 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] No Casino

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"I strongly object the a casino being placed in this fire proved area. The tribe is from Lake County (not Sonoma County). There is limited emergency access in case of another wildfire. We have had 4 major wildfires in the past 5 years. The current vineyard serves as a fire break and Old Redwood Highway is a single lane in each direction which was completely backed up during the last fire. People's lives are at stake here. People who have lived here and grew up here. This tribe should build in Lake County where their land is located."

**From:** Marilyn Volpert <peanutsgrama@yahoo.com>  
**Sent:** Tuesday, July 30, 2024 1:52 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] The Koi casino and potential crime as happened in Graton

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Hello Chad! I am sending this link about how the crime rate in Graton skyrocketed in Rohnert Park. It's nothing to do with the Tribe, or Tribes. It is the visitors, the thieving types, etc. I hope you don't let another family town become victims!

Thank you for listening and understanding. Marilyn Volpert. 8085 A Street Windsor, California 95492 707-480-4305

[https://myemail.constantcontact.com/Stop-Graton-Casino-now-Graton-Casino-Crime-Watch--facts-about-Rohnert-Park-crime-increase--more.html?solid=1102324248697&aid=GnaPh\\_2hEP0](https://myemail.constantcontact.com/Stop-Graton-Casino-now-Graton-Casino-Crime-Watch--facts-about-Rohnert-Park-crime-increase--more.html?solid=1102324248697&aid=GnaPh_2hEP0)

[Yahoo Mail: Search, Organize, Conquer](#)

**From:** Judy Gerstle <gerstle0519@gmail.com>  
**Sent:** Tuesday, July 30, 2024 2:49 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Koi Nation of Northern California Shiloh Casino DEIS - comments

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Dear Mr. Broussard,

Overall, the DEIS relies on far too many "best management practices" (BMPs) to overcome the significant problems posed by the proposed Casino. It's unlikely that so many BMPs will actually be followed, and the remedies will not be severe enough to act as a deterrent, leaving many of the negative consequences of the project unmitigated.

As for the proposed mitigations, they are hardly reassuring. For example, looking at the proposed mitigation for the intersection of Old Redwood Hwy. and Shiloh Rd., I see a plan that violates all contemporary traffic planning practices. In Windsor and many other communities across the nation, local governments are trying to encourage walking and bicycling by widening sidewalks, narrowing streets and adding protected bicycle lanes and roundabouts. What is proposed in this DEIS is just more lanes of traffic, creating a pedestrian and bicyclist kill zone at the intersection.

Thank you for your consideration of my comments.

Judy Gerstle

**From:** Billie Maccarthy <billiemacc1@gmail.com>  
**Sent:** Tuesday, July 30, 2024 3:59 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Casino

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Sent from my iPhone  
Please build your casino in your on county!! We don't need another one in Sonoma County.

**From:** Chris Lamela <chris@chrislamela.com>  
**Sent:** Tuesday, July 30, 2024 5:58 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Seminar questions

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Questions for Zoom:

## **7-30-24 Casino Zoom Meeting**

I have done considerable research on the Koi and have seen in their own words that their homeland is in Lake County and not Sonoma County. I can prove this by the lawsuits so arrogantly brought by the Koi against the City of Clearlake.

The report says that there will be 10,000 cubic yards of fill dirt brought to the site. That is about 1,000 trucks of dirt that will be driving past our front porch. How can the report say that there is no mitigation required. Is this the way they intend to continue to operate in the future?

Alternative A is absolutely unacceptable because it is expected to generate 11,213 total daily weekday trips and 15,779 total daily Saturday trips. That is a lot of traffic. The description of the road configuration is extremely cryptic. The best I can tell is that Shiloh Road will be opened to six lanes and Old Redwood highway will be opened to eight lanes. If that is correct how will that land be gotten without

tearing down houses or taking property from homes along Shiloh Road?

Why does the BIA seem to be fast-tracking this Project? The Koi are making it sound like this is a done deal. I thought we live in a civilized world where we respect each other's rights and do not encroach upon one another. Why should we have to pay the price for events that happened seven or eight generations ago?

- Chris Lamela

[chris@chrislamela.com](mailto:chris@chrislamela.com)

707-566-8790 PST

**From:** MJ Nelson <[strangemailers@gmail.com](mailto:strangemailers@gmail.com)>  
**Sent:** Tuesday, July 30, 2024 6:07 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] Please

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I want to officially object to the casino project

Mj Nelson

**From:** b.nies603@gmail.com <b.nies603@gmail.com>  
**Sent:** Tuesday, July 30, 2024 6:29 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Re: Written Statement regarding Koi Nation Shiloh Resort & Casino

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The location of the proposed Koi Nation Shiloh Resort & Casino is an illogical and dangerous choice for a 3rd casino in Sonoma County. The proposed location sits within no more than 100 feet of multiple residential communities, including a 55 and over trailer park community, apartment complexes and numerous single-family homes. Directly across the street from this proposed location is a baseball field, where children regular rely on riding their bikes to and from the park as transportation. With the addition of casino and resort, the significant road congestion, would create an incredibly dangerous situation for anyone who is walking or riding their bikes on these narrow residential streets. In addition to significant increased light and noise pollution for the surrounding communities due to increased traffic regardless of the proposed reduction of the building light and noise.

In addition to the added traffic, that the existing infrastructure cannot support the placement of a resort and casino in that location would pose a significant risk for not just the surrounding residential communities in the event of a wildfire but for guests and employees of the resort as well. Past wildfire events that have occurred, both Shiloh Rd and Old Redwood Hwy have both been completely jammed with traffic during an evacuation as for many residents it is their only route to escape. The addition of a resort with so many additional obstacles spell certain doom on these country roads. Adding in the stress of the resort would put on surrounding wells and the water table reserves and local resources would find themselves at a significant disadvantage in the event of a wildfire like the Kincadee fire of 2019 that came so close to engulfing Windsor. Furthermore, with water reserves being of significant concern in Sonoma County with recent record setting drought, and Sonoma County being a county that relies on agriculture as one of its main economies. The addition of this resort and casino not only would put undue strain on an already strained resource but the surrounding towns of Windsor, Santa Rosa and Larkfield would be greatly affected by the redirection of water.

This location has been a vineyard for years, the local ecology both flora and fauna rely on wildlands, albeit agriculturally significant to sustain, to pave over 69 acres of rural land will have a profound effect on the local wildlife and the environment. Sonoma county as a community is already experiencing profound climactic changes over the last decade, to continue to destroy what little agricultural land remains for continued development is the wrong direction for Santa Rosa, Windsor, Larkfield and Sonoma County.

Finally the crime inevitably this casino will bring to the surrounding communities, our local police forces are not funded or staffed to handle. Windsor does not have its own police force but rather relies on the Sonoma County Sheriff's department. Statistics provided from the Graton Casino and River Rock Casino and the increase in crime in the surrounding area are clear. With the surrounding residential communities, parks and schools within less than a mile from the

proposed placement of this resort and casino the increase and crime not only will have a profound effect on those residents but also will inevitably decrease property values.

**From:** Mary-Frances Makichen <mfmakichen@gmail.com>

**Sent:** Tuesday, July 30, 2024 7:27 PM

**To:** Broussard, Chad N <Chad.Broussard@bia.gov>; FOIA, AS-IA <as-ia\_foia@bia.gov>; Media, News <NewsMedia@bia.gov>; Interior Press <interior\_press@ios.doi.gov>

**Subject:** [EXTERNAL] KOI Nation Casino Sham Public Process Hearings

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Hello,

In Windsor California the Koi Nation whose land is in Lake County (50 miles away) and NOT Windsor is trying to put a casino in a RESIDENTIAL neighborhood. The Koi has partnered with the Chickasaw in OKLAHOMA not CALIFORNIA. This is NOT their land AT ALL.

EVERYONE who actually lives here in this community is not being listened to. The Sonoma County TRIBES are NOT BEING LISTENED TO. Can someone explain why the BIA does not seem to care about other tribes or the actual residents of this area?

This process has been a sham from start to finish. The environmental impact report is based on traffic during COVID, they are not taking into account all the new resident's in the area in the report. The report is over 6000 pages and consumers were given 45 to read it. It is written in all technical jargon. The report was produced by ACORN a completely biased bought and paid for organization. Get someone neutral in here to do an ACTUAL environmental report.

Not one person who called in, in support of the casino lives in the community. Somehow they were all carpenters who were magically supplied with exactly how many people will be employed during construction and after. Also, somehow magically they were all prioritized at the beginning of the call. How did that happen?

This is casino shopping. Not ONE Sonoma County tribe supports this project. None of the fire mitigations that are asked for can be ENFORCED.

I have made this comment before but when there is a wildfire or water issue this will be a disaster. When serious crime increases at the SCHOOL and CHURCH in this neighborhood there will be a REAL cost to the residents. When the disaster happens, I will be calling every media outlet I can and posting everywhere online to put the blame squarely on the BIA.

I don't begin to understand what kind of corruption is going on at the BIA and Department of Interior but there's not ONE person who's not on the Koi payroll who thinks this is remotely and I mean remotely a good idea.

It's so obvious that this is going to be approved. The ACORN group is already calling it the Shiloh Resort and Casino. I sincerely hope that anyone involved in approving this has a casino built in their residential community next to the home that they live in.

If you are people of conscience at all, this project should be rejected.

M Makichen

**From:** Deena Stapleton <goldengirl57@sbcglobal.net>  
**Sent:** Tuesday, July 30, 2024 8:08 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

Dear Mr. Broussard,

The environmental study report does not acknowledge the traffic issues around the route to the casino from the other side of Shiloh Rd that crosses with Faught Rd. Faught Rd is a skinny 2 lane road with ditches on either side, 2 sharp 90 degree turns surrounded by Oak trees. This road passes right by San Miguel elementary school. And this is right where I live off Faught Rd. With much experience with the traffic on Faught Rd I can attest this is already a road where drivers speed. There are accidents and deaths on this road. You can see flowers and crosses when you drive this way. And this is just "normal" traffic. Let alone increased traffic from casino traffic and increased drunk drivers from people drinking at the casino. Kids cross the street here to play in the park and in the neighborhood.

In the last hearing I stated the Environmental Impact Study needs to assess the traffic from Faught and Shiloh Roads, but that has not been done.

I am also concerned about the light pollution. I live backing to the fields and vineyards of this proposed site. Currently it is black at night as this is a residential and agricultural area. This casino will have a significant impact on light pollution affecting not only people, their views, our circadian rhythms— which are influenced by light, but also the numerous nocturnal animals. The light's effects on the local citizens and animals' circadian rhythms has not been addressed.

There is nothing assessed about the scenic impact. This majestic valley where the casino is proposed is adjacent to the Sonoma County Regional Park of Shiloh. It is beautiful, glowing, and peaceful. The numerous people visiting Shiloh Park daily to connect with nature— not a casino— have not been addressed.

Also, we have been on water restrictions for many, many years. There is no way...NO WAY the environmental impact report accurately reflects enough water to support this project.

Also, with regards to the carpenters union during the hearings talking about jobs—that hearing is supposed to be about the environmental impact; not the economic impact. And not to mention Sonoma county's unemployment rate is extremely low at 3.3% where local businesses can't even find enough workers to fill.

Anyways, again, I am opposed to this casino.

Thank you,  
Deena Stapleton

**From:** Carrie Marvin <caretoride@yahoo.com>

**Sent:** Tuesday, July 30, 2024 9:07 PM

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

**Subject:** [EXTERNAL] To the Bureau of Indian Affairs about the KOI NATION Shiloh Casino in Windsor CA

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It continues to shock the mind that the BIA is still considering this project. The fact is, that the GRATON Rancheria Coast Miwok and Southern Pomo and Litton Rancheria do NOT want this casino 15 minutes/miles away from them, just as they are expanding an already large casino to a significantly larger one. Not just that, but River Rock Casino, run by the Dry Creek Rancheria also do not want this casino which is 15 minutes/miles SOUTH of their casino. And an OK tribe stands to profit making millions upon millions of dollars. NorCal Carpenters union has sent their minions from places like Santa Cruz and beyond, hours away from our small town, calling in over and over to monopolize the calls – begging the BIA to approve this project- and these workers do not live here. They are union workers calling to get work. NOR CAL Union is based in Oakland with offices throughout California like Fresno, Sacramento, and San Jose. This is obscene. The Majority of them could care less about our town as they don't live here locally. I wonder if they have been paid to call in. For sure they just want construction work. Did the Chickasaw tribe ask them to call? I can't imagine how they might feel if it was in their neighborhood. Those carpenters just care about the almighty dollar and their next jobs. JOBS ARE NOT AN ENVIRONMENTAL IMPACT so not sure why they are calling in over and over, causing local neighbors to get off this call. Also as a reminder about jobs, Sonoma County has a 4% unemployment rate so it will also be difficult to hire local. These callers sound like an advertisement for gaming industries – while none or few of them live anywhere close.

We all know that the KOI are NOT native to the town of Windsor nor are they a Sonoma county tribe. They have Lake County heritage and do not belong here in Pomo/Miwok land. This is not the first piece of land they have purchased for this opportunity to casino shop, as they purchased land in Oakland. Even on WIKIPEDIA, they talk about how thousands of years ago, they were based in Clearlake. That is FAR from us. This is NOT their Aboriginal territory. This is clearly reservation shopping. Now the KOI are looking to decimate our small town that sits in the middle of a fire zone. They are planning on building such an enormous casino, hotel etc that they require over 5,000 parking spots and 7 wells. Evacuating during a fire is terrifying. We know that when there are too many cars and not a lot of places to go, with highways backing up and side roads filled with cars, people can die as they did in Lahaina. We continue to have fires – just had a small one on CHALK HILL ROAD a week ago, minutes from the casino. Fires are inevitable here and it will be completely irresponsible to build this casino. If the BIA causes deaths of Windsor residents and thousands of casino guests and casino workers trying to evacuate, I guarantee there will be lawsuits. We are warning you. We are telling you loudly and clearly this casino doesn't

belong in this neighborhood. We are screaming out loud to you- That the fire danger is quite high. It doesn't take into account how many new people are in Windsor, these new apartments. That this land was a wetland that was a firebreak. Also many of us local Windsor residents have lost our fire insurance. It has been incredibly difficult to get insurance now as State Farm cancelled almost all homes in Windsor.

In addition, This study was based on a 2021 traffic study when we were still in Covid. This is completely inaccurate. Faught Road is also not even considered. Fire stations BURNED DOWN in Tubbs – a brand new multimillion fire station in Santa Rosa burned to the ground in minutes. It's not about money and funding fire stations. Wildfires are not containable because a fire department is close in proximity. Clearly people calling in have NO experience in these wildfire situations. We here in Sonoma County know. We all know this is about money. Money for the carpenters union. Money for the KOI. Money for the Chickasaw. And none of them have any experience with these fast, horrific scary wildfires. This is REAL. This is OUR LIVES here in Windsor. These carpenters don't care. The Chickasaw don't care. And clearly the BIA has NO true understanding of what we live with and the fear of an errant cigarette being flung out the window as some casino patron leaves to head home. The casino, with 5000 parking spots, is going to be in an adjacent parcel to a children's park, a church, many family homes and a brand new LARGE apartment complex where people have yet to move into. In the photos showing alternative A/B you can see HOW CLOSE people's homes are to the casino. No study was even done with all of that additional traffic with the new apartments. There is also a proposed Asphalt plant going in on Shiloh on the west side of the freeway which will also bring excessive traffic and cement trucks coming and going. Again, no study done on how that will affect Shiloh exit and all of the roads surrounding.

It certainly seems like the Federal Government and the BIA is just pushing this through, not caring about the other tribes, not caring about our concern with water (and lack of it during drought years) and the incredible fire activity. Acorn Consulting clearly has a conflict of interest. The Feds are Not caring that this tribe isn't local. Not caring that our community doesn't want this casino in our small town and in a NEIGHBORHOOD. The document you prepared is almost impossible for just regular people to read and understand. I have tried to read and comprehend and it is nearly impossible. It was a short amount of time for us to digest and it should have been made much more understandable for us regular people who truly care about our environment. You are forcing this on us and destroying our land and our community. I know many people who hung up off this call saying, the BIA doesn't care. They are just going to ram it through. The way you are treating the other nations is abhorrent and the lack of understanding of wildfires is mind boggling. I strongly oppose this casino. Send the KOI to Clearlake to build their casino.

Carrie Marvin, town of WINDSOR

**From:** Sasha Fuller <sfuller1224@gmail.com>  
**Sent:** Sunday, July 28, 2024 4:44 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

This email is to OBJECT to the Shiloh Resort and Casino.

There was a recommendation to utilize the Sonoma County sheriff's for assistance with law enforcement. The sheriff's office is already suffering from short staffing and only has around a 25% success rate of hiring staff. Did you also know that recently the Sonoma County board of supervisors passed that the Sonoma County sheriff's office will now be responsible for maintaining peace within ALL parks within Sonoma county?! That's 60 parks totaling 15,506 acres of land. How should it be the Sonoma County Sherrifs office responsibility to maintain peace or respond to incidents at a casino when they will be now be required to provide their services to the citizens of this county. The fact that local law enforcement would be pulled away for a casino would cause additional shortages and increase response times.

This report also shows it would affect wells with the possibility of using those at esposti park across the street from the planned location as well as nearby wells already in existence. In droughts, which even though we may not be in one now but we will be again, this will cause major depletion of a source that is intended for the beauty and residents of Windsor.

This casino has already started causing housing costs and selling of homes to be jeopardized. The Oak Park neighborhood has 3 homes for sale that have been on the market for 2+ months. Offers have been made but as soon as they learned of the proposed casino, the buyers backed out. This casino hasn't been built and the residents across the street are ALREADY seeing the negative side effects this casino will have on them.

How can the EIS report predict the congestion that will be caused by the additional low income housing units currently being constructed in this same area? The congestion already will be an issue with the housing, but adding the additional onslaught of the visitors to the casino would create more of an issue for the Town but especially for the residents in the immediate areas. The

fear of fire evacuation accessibility is very real for those living along shiloh. Oak Park only has one road they can use, and even if the casino evacuates under the level of evacuation warning, what about the instances where we don't even get a warning! The results could be fatal to those living in the Oak Park neighborhood if they're not able to escape a burning neighborhood.

The massive size the casino is planned to be supposedly will create 1,000+ jobs, but how can the EIS determine how this will affect nearby businesses? How can they guarantee this will bring more money or income to this location when there are already casinos within 20 miles of the proposed location? The fact that there's even a chance this could takeaway from our local business owners is should not be allowed. There is a local movie theater, restaurants, entertainment venues, churches, hotels, that all run the risk of being affected negatively if this monstrous plan is approved.

How will this casino impact public infrastructure? School busses, city busses, SMART train access, airport accessibility, would all be negatively impacted for this area and increase safety concerns.

This tribe has already attempted two other casinos in Oakland AND Vallejo and have been rejected for both. They don't have any ancestral land ties and we don't need need another casino so close in proximity to the others in this county.

Please don't approve this casino! The negative effects on life in this small town community and immediate surrounding areas will be everlasting. How dare any tribe consider building the largest casino in Northern California in a residential area!

Protect our kids. Protect our community. Protect our way of life!

Thank you.

**From:** ann fitzgerald <ann.fitzgerald1@gmail.com>  
**Sent:** Tuesday, July 30, 2024 9:31 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Deis Shiloh resort and casino

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To whom it may concern:

I am a 25 year resident of Sonoma County living off of the West side of Shiloh Rd. I am against the construction of this casino hotel etc in this area. The traffic is already heavy even during non commute hours. The Shiloh exit is always busy due to the stores there and golf course schools and industrial park on the West side. In addition there are new apartments being built also off this exit.

The amount of congestion this will bring is more than the area can bare or should have to adding to stress and pollution of the area.

Sincerely  
Ann Fitzgerald  
5667 Windsor Rd  
Windsor ca 95492  
Sent from my iPhone

**From:** Paul Willard <webgeek@gmail.com>  
**Sent:** Tuesday, July 30, 2024 11:41 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Koi Casino

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Mr Broussard,

For the record, I believe the Koi have met their environmental impact requirements. I further believe this project has the potential to change the direction of the future of the Koi, and I have seen this happen as a Cherokee citizen. So I think a significant compelling argument would be needed to stop this legal project from moving forward. Finally, I believe the complaints of tribes within a colonizer border of Sonoma County are disingenuous. Before the Koi had their lands claimed by Americans, there was no Sonoma County, so being within some arbitrary boundary set later by the American government does not matter here. If the Koi were from another state or hundreds of miles away fine, but in this case, they are recognized as being in an adjacent American government defined county 15 miles away. I do not think the American government has the right to say they can not develop here so close to their home, regardless of an America defined boundary. The tribes that happened to fall within this White defined boundary would never defend a White defined boundary except if they thought it in their own economic interests. I don't begrudge their pursuit of their own economic interests but I think they have no bearing on procedure and legal right. I am sure you recognize this and appreciate the chance to put a voice in.

Thank you,  
Paul Willard  
644 Brown St, Healdsburg, CA 95448

**From:** Donna Pfeifer <donnajpfeifer@gmail.com>  
**Sent:** Wednesday, July 31, 2024 9:35 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Cc:** Kristen McKenna <Kristenmckenna1@sbcglobal.net>; Dan Pfeifer <danpfeifer87@gmail.com>; efortuna@codeforamerica.org <efortuna@codeforamerica.org>  
**Subject:** [EXTERNAL] Casino objection

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I strongly object the proposed casino being placed in this fire proved area. There is limited emergency access when there's another wildfire. We have had 4 major wildfires in the past 5 years. We had to evacuate our homes and neighborhoods in droves of vehicles. Running for our lives in the 2017 fire, as fire surrounded our only escape route road. Old Redwood Highway is the runoff highway connection to all these neighborhoods near the proposed casino. Old Redwood Highway is a single lane in each direction which was completely backed up during the last fire. Lives are at stake here!

We already have two major Indian casinos here in Sonoma County. This proposed casino is overkill in this over populated area.

Thank you for your consideration in this matter.

Donna Pfeifer family

**From:** carlotta cloney <carlotstan@att.net>

**Sent:** Wednesday, July 31, 2024 12:48 PM

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

**Subject:** [EXTERNAL] Objectioin to proposed casino at Shilo and Old Redwood in Santa Rosa, CA

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To whom it may concern:

Building a casino at the above mentioned location is a terrible plan. That is already a busy intersection and the casino would be adjacent to a residential area and park where children play baseball and other sports. Parking is already at a premium. The congestion would not be manageable. Also it would be right across the street from a church.

What would we do in case of another wild fire? We are in a fire prone area and have already had to evacuate twice in the last few years. We would absolutely not be able to evacuate, it would be a disaster.

Concerned citizen.

**From:** Ron Grassi <ronsallygrassi@mac.com>  
**Sent:** Wednesday, July 31, 2024 2:49 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort

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

Dear Sir, We are writing in opposition of allowing another casino to be built in Windsor. There are already two other casinos in the same area, both accessible by a short car ride. The negatives for this development are traffic concerns, water source, air pollution, fire, evacuation measures, and noise.

Sonoma should not become known as the Casino County. Our county should protect its rural and agricultural landscape, vineyard orientation , scenic views, and peacefulness .

Because this area in Windsor was once part of a Native American trade route should not qualify it as Native American land with historical connections.

There are better ways and businesses to protect tribal cultural resources. A non gaming alternative should be explored, such as solar panel development or maybe some cutting edge industry.

Please DON'T ALLOW this casino complex to advance. Let's think about meaningful alternatives.

Sincerely,

Sally and Ron Grassi

**From:** Nadine Condon <nadine@nadinecondon.com>  
**Sent:** Wednesday, July 31, 2024 3:01 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS comments Koi Nation Shiloh Resort: AGAINST

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

My husband and I are firmly opposed to the Koi Nation Casino proposed for Windsor, California. We are often in that area and know from experience, the difficulties in evacuating during wildfires. We have evacuated three times since 2017. Not only the congestion and unfeasibility of any successful evacuation plan, putting a casino-hotel in the middle of a quiet, middle class residential neighborhood is poorly conceived.

Nadine Condon  
602-503-8288 cell  
nadine@nadinecondon.com

**London Book Festival 2023:** WINNER, Best Bio/Memoir  
**CONFESSIONS:** *Stories to Rock Your Soul.*

**From:** Susan <revsusanbh@aol.com>  
**Sent:** Wednesday, July 31, 2024 3:36 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino OPPOSED!!!

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

As a resident of Windsor, I would like to register my adamant opposition to the development of this casino project on Shiloh Road. It would be hard to think of any possible project that would be more objectionable than this one. How this could even be seriously considered is absurd! It is completely incompatible with the location in every way!!!

Our area is already saturated with casinos what with River Rock and Graton! Enough is enough!!!

*Susan Burnett-Hampson*  
cell: 707-239-1205

**From:** John Kamola <johnpkamola@gmail.com>  
**Sent:** Wednesday, July 31, 2024 5:02 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments Koi Nation Shiloh Resort and Casino

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

I live off of Airport Blvd in the Larkfield area of Santa Rosa. This area is congested enough already and the thought of a resort / casino and the traffic that it will attract is alarming. Please do not build this here.

John Kamola  
141 Wikiup Meadows Dr.  
Santa Rosa, CA  
95403

**From:** Bonnie Farrow <bonnie-business@sonic.net>  
**Sent:** Wednesday, July 31, 2024 6:03 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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EIS Comments, Koi Nation Shiloh Resort and Casino

Attention Chad Broussard  
 Environmental Protection Specialist  
 Bureau of Indian Affairs, Pacific Region

ES15 page 24

Property Values Alternatives A, B, C are listed as LS, Less Than Significant.

I live in Oak Park near the corner of Shiloh and Old Redwood Hwy. Two years ago in 2021 a house in our area sold for \$1.2 million. It was before any talk about a Casino, so the people were ahead of the curve.

Since this time, 3 houses 3 months ago were put on the market for approximately the same price that the house in 2021 sold for. One of the houses, sold almost immediately. News of the Casino caused the deal to fall through and it now sits on the market unsold. Oak Park property values are already dropping significantly.

ES16 page 25 Environmental Justice: Minority and Low Income Communities

Alternatives A, B, C are listed as LS, Less than Significant and PS  
 Potentially Significant

Insurance Premiums in Oak Park neighborhood will increase significantly.

The insurance premiums will be increasing because of the time needed for First Responders to get to Oak Park. We will have a lot more traffic on Shiloh Road soon because of the new developments on the corner of Shiloh Road and Old Redwood Hwy. <https://discoverwindsor.com/projects/shiloh-terrace-affordable-housing> , and on Shiloh Road next to Home Depot: <https://www.townofwindsor.com/1396/Shiloh-Crossing> .

I don't see how we, Oak Park subdivision, elderly residents on fixed incomes can live with the significantly increased traffic causing insurance increases, and a casino reducing the prices of our properties. We will all be going under financially and there is no common sense with the KOI nor any regard for Windsor neighborhoods. Do you remember at all your rules for a Casino in a housing neighborhood? Apparently not. I am literally a stones throw away from the Casino. Five houses away from business lights on 24/7/365. Bright lights, air pollution and noise from 5000 people a day coming and going in busses, motorcycles and cars.

Water usage that will dry up our well water.

I also understand that in a fire, the Casino and hotel residences will be allowed to vacate first, and the neighborhood that I live in after them.

This is not what happens in the REAL world. In the REAL world, like the Tubbs Fire people were running to pick- up trucks and throwing themselves into the bed of the truck. One woman worried that her hair was going to catch fire. It is hell on earth and fear because of a fire-storm on both sides of the road. Many people died that day because they couldn't get out fast enough. No one will wait to have the Koi vacate the hotel and casino area first. South Windsor and Highway 101 will be a parking lot because of the 5000 cars the casino and hotel will add to our neighborhood and Shiloh Road.

The Koi need to find another piece of property that will house a Casino and hotel away from residential neighborhoods.

Bonnie Farrow  
5820 Mathilde Drive  
Windsor, CA 95492 [bonnie-business@sonic.net](mailto:bonnie-business@sonic.net)

**From:** coryhibdon3 <coryhibdon3@gmail.com>  
**Sent:** Wednesday, July 31, 2024 8:46 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino.

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My family and I strongly reject the idea of putting a another casino in the Windsor area, the Koi Nation is not native to this particular area they should not be allowed to build their casino in the Windsor area. We don't need another casino, it will only bring traffic & crime to this area.

I don't believe that they should put their casino in this area because they are lying about being native to this area just like they lied about being native to the Oakland Richmond area. They are native to the Clearlake in lake country and in lower lake Rancheria, if they want a casino they should put it were they are from LAKE COUNTRY. We DO NOT NEED ANOTHER CASINO within 15 minutes apart of Graton and River Rock

I see it will be a crime seeking area if they put the casino up especially in the residential area that is close by the area.

So please I'm asking you the help fight this matter. And say NO TO THE KOI NATION SHILOH RESORT AND CASINO!!!.

Very worried resident.  
The Hibdon Family  
(Cory & Fred Hibdon)

Sent via the Samsung Galaxy S21 Ultra 5G, an AT&T 5G smartphone

**From:** Marc LaMantia <[mclam@sonic.net](mailto:mclam@sonic.net)>  
**Sent:** Wednesday, July 31, 2024 6:54 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** Re: [EXTERNAL] Koi Nation EIR hearing

Thank you very much for the quick reply and information . Can you please ask your legal team if not providing registration information in the public invitation to the public in this newspaper article is in violation of the Brown Act . From my experience , I feel that it is in violation of the Brown Act which does have consequences.

A Reply would be appreciated and or a contact to your legal people.

Thank you, Marc LaMantia  
 Sent from my iPad

On Jul 30, 2024, at 5:52 PM, Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)> wrote:

If you're having trouble signing on you can register on the website here: <https://www.shilohresortenvironmental.com/>. A copy of the environmental document can be found there as well.

Sent from my iPhone

On Jul 30, 2024, at 5:33 PM, Marc LaMantia <[mclam@sonic.net](mailto:mclam@sonic.net)> wrote:

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Chad , you have a huge problem. Somebody left out the information to sign up for this hearing in the article in the paper today. Says " You can sign up here " but no info to do so. I think this is in violation of the Brown Act .

Can you also send me a copy of the EIR, for my review.

Thank you , Marc LaMantia  
 Sent from my iPad

**From:** Hugo & Cynthia Landecker <clandecker@saber.net>  
**Sent:** Tuesday, July 30, 2024 4:02 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

Chad Broussard  
Environmental Protection Specialist  
Bureau of Indian Affairs, Pacific Region

Dear Mr. Broussard:

I am writing to protest the idea of a huge casino and resort being built near the town of Windsor, California, for the following reasons:

1. The Koi nation is not a local tribe and has no particular ties to local land. If this proposal were to be approved, it would give permission for any tribe to swoop into any area of the United States, override local planning and best-use scenarios for the land, and subject local citizens to the hugely destructive impact of over-development.
2. A casino/hotel complex is definitely not the best use for this particular land! It should either stay in agriculture so the region can remain food-secure, or it should be housing. Northern California's biggest need is housing, not roulette wheels. Also, recent years have brought untamable wild fires and ever-increasing heat to northern California. Bringing 5,000 visitors and their cars into the area is inviting an epic disaster.
3. Casinos by their very nature attract visitors who do nothing for the region but throw away their money on gambling. This may enrich the tribe and some of its wealthy backers, but will not help local economic and community needs in any way.
4. California Indians need redress for the awful things done to them in the past, but a solution can't be considered that does more harm to the general well-being of a community than it does good.

I hope your team will consider these points in your deliberations. I know I speak for many in the Sonoma County community who share my opinion about this casino idea.

Very truly yours,

Cynthia Landecker  
409 Denton Way  
Santa Rosa, CA 95401  
[clandecker@saber.net](mailto:clandecker@saber.net)

PACIFIC REGIONAL OFFICE

Amy Dutschke  
Regional Director

~~AUG~~  
2024 JUL -5 AM 11:27

Bureau of Indian Affairs, Pacific Region  
2800 Cottage Way, Sacramento, CA 95825

I listened with interest to the zoom call on the EIS for the proposed Koi nation casino project outside Windsor and it was striking to me that virtually everyone who spoke in support of the casino was from the carpenters union or one of the construction trades, none of whom indicated if they lived anywhere near the affected area.

Meanwhile, people who live and work in the area and, especially, the tribal members from nations who actually claim Sonoma County as their home uniformly oppose this project. People who have lived through fires, droughts and evacuations are rightly concerned that this huge project, supposedly for the benefit of the 90 members (!) of the Koi Nation is being directed, funded and for the financial benefit of the Chickasaw Nation of Oklahoma.

The Sonoma County nations have rightfully pointed to the tenuous relationship of the Koi nation to Windsor - the Koi have historically been associated with Lower Lake in Lake County where their history spans hundreds of years. The Koi have attempted to construct casinos in Oakland, Vallejo and now Sonoma County, none of which are their true ancestral lands.

I have never objected to any other Native American project in Sonoma County, even though some of them are much closer to my house: I believe we owe much to the original inhabitants. However, in this case it certainly seems like this is a small tribe in search of a big payday but with very little actual interest in history (theirs included), the environment, the community, water supply or the support of their neighbors.

We strongly oppose this project and urge the BIA to deny the Koi Nations bid to build this project.

  
Richard & Donna Sanfilippo  
1515 Gumview Road  
Windsor, CA 95492



**From:** Deborah Corlett <[dcorlett@obrienlaw.com](mailto:dcorlett@obrienlaw.com)>  
**Sent:** Thursday, August 1, 2024 11:58 AM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Cc:** [whiteheade@aol.com](mailto:whiteheade@aol.com) <[whiteheade@aol.com](mailto:whiteheade@aol.com)>  
**Subject:** [EXTERNAL] RE: DEIS Comments, Shiloh Resort and Casino Project

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Please see additional attached letter on the subject proposed project. Thank you.

*Deborah G. Corlett, Esq.*  
*Certified Specialist, Estate Planning and Trust & Probate Law*  
*California State Bar Board of Legal Specialization*

***O'Brien Watters & Davis, LLP***

1550 Airport Blvd., Ste. 201  
Santa Rosa, CA 95403  
[dcorlett@obrienlaw.com](mailto:dcorlett@obrienlaw.com)  
707-545-7010 (ext. 427)  
Fax: 707-544-2861

**From:** Deborah Corlett  
**Sent:** Wednesday, March 27, 2024 12:59 PM  
**To:** 'chad.broussard@bia.gov' <[chad.broussard@bia.gov](mailto:chad.broussard@bia.gov)>  
**Cc:** [whiteheade@aol.com](mailto:whiteheade@aol.com)  
**Subject:** NOI Comments, Koi Nation Fee-to-Trust and Casino Project

Please see attached letter with comments on the subject proposed project. Thank you.

*Deborah G. Corlett, Esq.*  
*Certified Specialist, Estate Planning and Trust & Probate Law*  
*California State Bar Board of Legal Specialization*

***O'Brien Watters & Davis, LLP***

1550 Airport Blvd., Ste. 201  
Santa Rosa, CA 95403  
[dcorlett@obrienlaw.com](mailto:dcorlett@obrienlaw.com)  
707-545-7010 (ext. 427)  
Fax: 707-544-2861

Deborah Corlett  
680 Leafhaven Lane  
Windsor, CA 95492  
707-838-3663

[whiteheade@aol.com](mailto:whiteheade@aol.com) ; [dcorlett@obrienlaw.com](mailto:dcorlett@obrienlaw.com)

August 1, 2024

Via email: [chad.broussard@bia.gov](mailto:chad.broussard@bia.gov)  
Chad Broussard, Environmental Protection Specialist,  
Bureau of Indian Affairs

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

RE: DEIS Comments, Shiloh Resort and Casino Project

Dear Ms. Dutschke:

This letter contains my comments relating to the Environmental Impact Statement draft on the subject project located on the southeast corner of Old Redwood Highway and Shiloh Road south of the Town of Windsor, Sonoma County, California.

As I stated in my prior letter dated March 27, 2024, my family and I have lived in Windsor in the same house for the past 32 years, which is located about 2 to 3 miles north of the proposed development. We have deep roots in the community.

After a quick read of the subject Environmental Impact Statement draft, a few of my concerns previously conveyed remain. The primary issue is that the Environmental Impact Statement is limited to its regulatory parameters and by its nature cannot address the impact to the extended surrounding area and inhabitants.

The addition of yet another casino in an area with limited resources and population will continue to drastically cause negative change.

The impact on the local businesses, the available water and access to viable escape during wildfires cannot be mitigated sufficiently to negatively impact the current residents and environment, which currently need additional mitigation even without this expansive proposed development.

Sonoma County is caught between requiring additional affordable housing for its current residents and needing to limit growth due to limited water resources. Windsor's water sources are wells on the Russian River. Residences outside the town limits must rely on local wells. The water table in the area has gone through several years of drought and local agriculture suffered. During those years, water use was severely restricted in Windsor (and some communities in this and northern counties required water to be trucked in or people to move out). We were very fortunate that unusually high rains in the past few years have made those restrictions a not-so-distant memory. The area simply cannot sustain additional water usage even with extensive reuse of water. (And, the question remains, where will the staff for the development live when the area currently lacks sufficient affordable housing "stock" for its teachers, police, firefighters and other employees.)

Additionally, I cannot overly stress the horrible conditions in the area during wildfires. The climate and geography have resulted in constant wildfires, particularly during the late summer and early fall. Wildfires have always been a part of the landscape; the native vegetation is adapted to them. (We have watched the glow from fires march down the hills toward the area of this proposed development and on toward Santa Rosa ever since we moved to the area.) But in the past 5 – 10 years, they have become more often, stronger and vastly more destructive. The winds have become hotter, drier and stronger.

During the Kincaid fire (2019), all of Windsor was evacuated, along with the rest of the county, including the area of this proposed project. The residents were given 7 hours to evacuate, and within 2 hours of the notice, the roads out of the area were jammed down to a crawl. There are no viable alternative routes out of the area. A drive from our house to Highway 101, which usually takes about 5 minutes, took us 2 hours. The drive from Windsor to Santa Rosa, usually 10 minutes, took 3 to 4 hours. There was a very real concern that if the approaching fire picked up speed we would be caught in our cars, as tragically happened in Paradise, CA, the next year. Widening the intersection of Shiloh and Old Redwood Highway will do nothing to address this. Even with the current population, such a widening and other mitigation measures in the Environmental Impact Statement will do nothing. It is a sad fact that this is a result of climate change that cannot be mitigated solely on a local scale so that a development can be approved for short-term proposed monetary gain.

To give a perspective on the local wildfires, the prior Tubbs fire, occurred so rapidly with such intensity, people were caught and died in their homes and their cars. That fire jumped Highway 101 in Santa Rosa and burned down most of a subdivision (Coffey Park) that was not considered to be at risk of fire. Hospitals, courthouses, multi-story office buildings and markets were either burned or at risk. The metal on cars melted to the ground. The contents of "fire-proof" safes incinerated. People's remains were burned to the point that they could not be identified. (They became part of the ash.) The upscale housing area east of this proposed development on Shiloh, lost numerous homes in these fires. To put a hotel and casino in such a location is not only foolhardy, it borders on criminal should lives be lost due to future fires. No amount of mitigation is a defense when the fires become so hot and extensive.

August 1, 2024  
Page 3

Please seriously consider the water limitations in the area and the wildfire risks we have all lived through.

Thank you very much for considering my comments. If you would like further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah G. Corlett". The signature is fluid and cursive, with the first name being the most prominent.

Deborah G. Corlett

**From:** Thomas Richard <harmonist2@yahoo.com>  
**Sent:** Thursday, August 1, 2024 1:32 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Koi Nation Casino-Resort of Windsor.

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Mr. Chad Broussard,

I am writing to voice my objection to yet another casino being built, this time in Windsor. There are many reasons, which include, increased traffic on roads that are already overloaded. One more place for people to loose their money. Most of the casinos I've seen are dark, dingy places that lack windows and natural light. Please don't build another eyesore on what's left of a beautiful area.

Sincerely,

Thomas H. Richard

**From:** Andy <aehpmh@sonic.net>  
**Sent:** Thursday, August 1, 2024 9:36 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

Dear Chad,

My wife and I live about 1 mile south of the Koi Nation's proposed casino site. I am writing to request that you not allow this casino to move forward for the following reasons:

- 1) It is a mostly rural area, with some houses and vineyards. A casino would be way out of place and would destroy the rural nature of the area.
- 2) The Koi Nation is not from this area, so I don't see how they can claim this as their "ancestral home."
- 3) Sonoma County needs more housing and not more casinos. We already have the huge Graton Casino in Rohnert Park, which is much closer to Bay Area population centers, and River Rock Casino in Geyserville. We do not need another casino.
- 4) If the casino is built, it will bring lots of traffic and corresponding air pollution to the area.

Please do all that is in your power to prevent this casino from being built.

Thank you,  
Andy Howard  
5357 Sunnybrook Ct.  
Santa Rosa, CA 95403

**From:** MARY HESS <mtnmusic@att.net>  
**Sent:** Monday, July 29, 2024 4:08 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] DEIS Comments, Shiloh Resort and Casino Project

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DEIS Comments, Shiloh Resort and Casino Project

Hello Chad,

I am writing once again to urge denial of the building of the proposed Shiloh Resort and Casino. I know you have heard the following arguments before, but you and those who are manipulating this situation do not seem to be taking these seriously. All for gain for a few - a reparation attempt that is badly misplaced.

The relative open space between Larkfield/Wikiup and Windsor is a necessity to keep as open space for several reasons.

- 1) The traffic impact will be several times greater for the entire area. Old Redwood Highway is a commuter corridor, particularly during the school year. Traffic will be horrendous for the residents from Windsor to Larkfield.
- 2) In this day and age of climate change, I know many people who cycle along Old Redwood. Cars and bicycles do not mix well.
- 3) Having lost my house in the Tubbs Fire, I am terrified of the traffic jams that will happen when the next fire roars through the area.
- 4) The added traffic will force many residents and casino-goers to use Faught Road which is narrow, curvy, and runs past an elementary school. I, as a cyclist, will be taking my life in hand when speeding and possibly drunk drivers go past.
- 5) Shiloh Regional Park and the wildlife therein will be impacted by the proximity of yet even more buildings in the area, parking lots, car parks and all the ugliness that attends complexes such as these.
- 6) Gambling is a tax on the poor. It is a social evil.

Please remove these plans far way - like back in Lake County where this tribe originates.

Best regards,  
 MARY HESS

**From:** Michael Skurtun <mskurtun@sonic.net>  
**Sent:** Friday, August 2, 2024 4:11 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] ESI Comments, Koi Nation Shiloh Resort and Casino

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

Dear Chad Broussard,

I am vehemently opposed to the Koi Nation's plan to develop a huge, or any size, casino/resort complex on Shiloh Rd. for the following reasons:

- 1) It's a completely different location and even country, than their aboriginal lands or territory
- 2) It's directly across the street from a neighborhood with children
- 3) It's just down the street from Esposti Park, a youth park with heavily used city developed and maintained youth soccer and baseball fields
- 4) The location on Shiloh Road has nothing to do with their aboriginal territory, and as any objective person can see, it's simply a land grab conveniently located near Hwy 101

Thank you for your consideration,  
Michael Skurtun  
Windsor, Ca

**From:** Evan Havstad <havstad89@gmail.com>  
**Sent:** Saturday, August 3, 2024 11:05 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

Hello,

I am writing to voice my opposition to this proposed casino. After reviewing the EIS, my primary concern would be the impact to evacuation traffic during an emergency. Shiloh Road will be a major thoroughfare for those evacuating from Shiloh Ridge Estates, as well as a secondary egress route for residents along Chalk Hill Road. Facilitating egress from these high wildfire risk areas needs to be paramount, and adding a casino of this size will only impede egress. In addition to the regular traffic at the intersections of Old Redwood Highway and Shiloh Road, new housing developments in progress will only exacerbate this concern.

A secondary concern would be of the crime in the immediately surrounding area. I see in the EIS that an MOU would be written to coordinate with Sonoma County Sheriff, however I see no mention of compensation for law enforcement services for this added tax on an already understaffed department.

A third concern that is not addressed in this EIS is the impact climate change will play on multiple factors. The floodplain of Pruitt Creek will be subject to change following wildfires increasing runoff and sediment loading of the creekbed. Additionally, a parking area and buildings of this size will create an urban heat island effect, magnified by the effects of climate change, cumulatively with additional development in the area.

The agrarian setting of this proposed casino is not conducive to the appeal that Sonoma County draws to tourists. By bulldozing vineyards and replacing with concrete and asphalt, the Koi nation is ruining an area that is not their historic homeland. I would love to support the Koi nation in their efforts of financial independence and sovereignty, but a casino in Sonoma County is not the way to go about it.

Thank you for listening to my concerns.

Evan Havstad  
Sonoma County Resident

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W—2820  
Sacramento, CA 95825

PACIFIC REGIONAL OFFICE  
~~2024 JUL -7~~ <sup>AUG</sup> AM 10:55  
BUREAU OF INDIAN AFFAIRS

Re: EIS Comments, Koi Nation Shiloh Resort and Casino

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

The proposed casino is at the corner of Shiloh Road and Old Redwood Highway. From that intersection, there are two traffic lights on Shiloh Road to get through in order to get on Hwy 101, the main freeway. It can already take up to three turns of the lights to get through those lights, and another light beyond the on-ramp to Hwy 101 can also cause traffic to back up. This is a two-lane road that is already inadequate for the existing traffic. There are several high-density housing developments currently under construction on both Old Redwood Highway and Shiloh Road, and several more lots are posted with signs indicating that they are also ready for development. The traffic study done by the Koi Nation didn't include any impacts from the new developments already underway or from the planned developments. The southbound traffic on Hwy 101 is already bad during the commute hours, stop and go from Windsor to and beyond Santa Rosa. We've been told the Graton casino in Rohnert Park gets 20,000 guests a day. If the Koi casino is even larger, the traffic in Windsor and the freeway traffic heading south will be a nightmare.

The proposed site is in a high fire danger area that has been forced to evacuate for wildfires or been put on alert for possible evacuation several times in the last several years. When we had to evacuate during the Kincadee fire in 2019, my husband was at Home Depot on Shiloh -- it took him almost an hour to get back to our house which is just a mile away. According to MapQuest, it should only take 4 minutes! Adding a casino to

the area with around 2,000 employees and an untold number of guests is insane. When the next wildfire goes through, people could die in their cars like the tragedy that happened in Paradise, CA.

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

When the Graton Casino in Rohnert Park opened for business, it cannibalized 50 – 70% of the River Rock Casino's business in Geyserville according to the Press Democrat. The Koi Nation is a Lake County tribe with roots 50 miles away yet they bought land in Sonoma County just about half way between two existing casinos owned by Sonoma County tribes – and I don't think that was a coincidence. They plan to take business away from the two Sonoma County casinos. There are two other local tribes in the area that have expressed an interest in building casinos. The Koi Nation may have the right to build a casino in California, but it needs to happen on their own ancestral land in Lake County. It isn't fair to the local tribes to have to compete with them.

The proposed site is right next to housing developments and a church, and less than a mile from an elementary school. That is a horrible choice for a business which will bring more traffic, crime, noise, and light

pollution. Admittedly, the treatment of Native Americans in this country hundreds of years ago was terrible, but the people who own houses across the street from the proposed casino aren't responsible for what happened such a long time ago. They will be severely impacted by this casino, and their property values will plummet. My guess is that many of the houses would be devalued to the point that some homeowners would owe more on their mortgages than their homes would be worth if the casino is built. How can it be fair to let a ninety-member tribe from outside the area take so much from so many people? Other than the tribe itself, the only other people who seem to be in favor of the project are a few construction workers because it would provide jobs. These jobs would be temporary, but the damages to everyone else in the area would be permanent.

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

Respectfully,

A handwritten signature in blue ink, appearing to read "Chris Thuestad", with a long, sweeping horizontal line extending to the right.

Chris Thuestad  
6186 Lockwood Drive  
Windsor, CA 95492

**From:** Maralee Parsons <parsonsm360@sbcglobal.net>  
**Sent:** Sunday, August 4, 2024 4:48 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, KOI Nation Shilo Resort and Casino

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

Please see the attached comments for your review.

Regards,  
Maralee Parsons  
193 Merner Drive, Windsor CA 95492

4 August 2024

Chad Broussard  
Environmental Protection Specialist  
Bureau of Indian Affairs

**EIS Comments, KOI Nation Shilo Resort and Casino  
Submitted by:  
Maralee Parsons, 193 Merner Drive, Windsor CA 95492**

I am writing in response to the Environmental Impact Statement (EIS) published on July 8, 2024, concerning the Koi Tribe's proposed development of the 68-acre property located on the SE corner of Old Redwood Highway and E. Shiloh Road.

The land purchased by the Koi and Chickasaw Tribes in Sonoma County is bordered by E. Shiloh Road which includes a 77 home residential neighborhood and a public Park to the north; residential neighborhoods, a school, and vineyards to the east; residential to the south; and Old Redwood Highway, residential and Shiloh Neighborhood Church, to the west. This is a strictly residential, recreational and agricultural area. Placing a 24 hour a day entertainment complex in the middle of these neighborhoods will unquestionably cause significant safety, traffic, noise and social impacts on every household, as discussed below. In my opinion, the EIS puts forth little to no additional comprehensive studies, data or mitigation efforts other than what was articulated in the previously published Environmental Assessment.

Traffic/Transportation

TJKM was retained to prepare a Traffic Impact Statement (TIS) on the impact the three proposed alternatives would have on transportation and circulation services in the area. TJKM prepared the TIS with minimal data. The only actual data related to this project comes from traffic monitors set up for a few hours over two days in January 2022 and one day in July 2022. The weather is cold and wet in January, and the data collected would be significantly different from that gathered over spring and summer when baseball leagues are active, and people are using the two neighborhood parks. During Spring and Summer, the parks are used daily by youth softball games, and the parking lot is full, resulting in overflow parking on Old Redwood Highway and E. Shilo Road.

The EIS references seven Cumulative Projects in section 3.14.1 that are either in construction or in the Planning and Development stage, four of which are within 1/4 mile of the proposed project. These developments will bring in approximately 500 new residential households making multiple daily trips within 1/2 mile of the proposed Casino/hotel complex. While generally referencing in the study that the cumulative projects will have an

impact on Transportation and Circulation, there is no specific information in the report or Appendices on how the cumulative residential projects will impact traffic conditions and loss of services. This must be addressed and studied further with current data.

Appendix I to the EIS estimates there will be 11,213 daily trips and 15,799 Saturday trips to and from the Koi Casino complex. There are estimates of as many as 1340 hourly trips... or 22 cars per minute. The Traffic Impact Study (TIS) confirms that this traffic increase will have a substantial impact on the roadways and intersection that rise to a level of unacceptable Loss of Services (LOS). The TIS then cites mitigation efforts that will make the LOS acceptable without providing any substantive information on how this will be accomplished. It does not offer any concrete information on how the mitigation efforts will improve conditions or provide any guarantees that they would be effective. This must be addressed, and mitigation efforts spelled out in detail.

### Water resources

Potable water- The EIS projects that Alternative A would pump between an average of 170,000 gallons per day (gpd) to a daily peak of 294,000 gpd from onsite wells. The new well(s) will require a water treatment plant and a large storage tank to hold the treated water. Water from the treatment plant would be sent to a one-million-gallon storage tank and then to a pumping station for distribution to the facility. The drawdown on existing wells is a very real likelihood. The evaluation discounts or ignores climate change, drought and water rights issues. The EIS indicates that the onsite wells would be deep wells (700 feet) and that the shallow wells belonging to nearby residents are at most risk. How will this be addressed? The report discounts the risk, cost and impact of reduced or inadequate water supplies to local residents.

Wastewater- The EIS calls for the construction of a Wastewater Treatment Plant (WWTP) to treat the estimated average of 232,000-335,000 gallons of wastewater discharged each day, or 1,624,000 on an average day and up to 2,345,000 on peak days. Figure 2.5 in Appendix D is a diagram of the Project Water and Wastewater Feasibility Study Wastewater Treatment Process Flow. Estimating its size (using the truck as a gauge), the system will be over 500 feet long x 300 feet wide and up to three stories high. There is also the likelihood of odor emanating from the plant, subjecting the hundreds of families who live in the immediate proximity to this environmental nuisance/hazard.

Groundwater Discharge- The project site is currently a 68-acre vineyard. As farmland, the landscape is permeable, allowing for water to permeate the soil. The proposed project will result in over 35 acres of this land being paved and developed, significantly altering groundwater conditions. In addition to the loss of permeable land there is significant risk of pollutants entering Pruitt Creek despite “best management practices”. In my view, this is a “significant impact”.

### Public Evacuation

This is my greatest concern. The proposed Alternatives A, B and C will attract a large volume of patrons who will need to be evacuated during a wildfire event. The facility will have parking for over 5,000 cars and will accommodate more people than cars. There will also be people using rideshare and public transportation and any evacuation plans will need to account for this group. The Project Site would have access to two major emergency routes identified by the Town of Windsor: Shiloh Road and Old Redwood Highway. These are single lane roads which will not only be used by casino patrons but also used by evacuating neighborhoods. Past evacuations during the Tubbs and Kincaid fires resulting in stopped traffic and dangerous conditions on both roads, with embers landing around cars. Old Redwood Highway and Shiloh Road cannot handle the addition of thousands of more cars and people during a time-critical evacuation effort.

The EIS recommendations include following “best management practices” and training employees on evacuating guests in the event of a fire. Well, that may help to get casino guests out of the casino safely, but does not, in any way, address the tremendous strain on the emergency evacuation routes, hindered access for emergency responders, and the potential loss of life for residents. This must be addressed!!

Socioeconomic conditions-

Crime- The EIS and Appendix B-1 do not provide any substantive information other than the fact that law enforcement received 1,700 calls and made 39 arrests at the Graton Rancheria in its first year of operation. After a comparison of the Graton Rancheria Casino and the proposed Alternative A, the EIS concludes “As a result of this quantitative and qualitative analysis, GMA finds that the negative impacts on community services in areas in which a casino has opened are generally minimal.” The report, however, does not include any “quantitative and qualitative” information other than from the 2014. This must be addressed and re-evaluated using current data.

Drunk Driving- The EIS states “The proposed project intends to serve alcohol consistent with a liquor license, which could result in an increase in drunk driving incidents.” It then states, “Drunk driving prevalence is not anticipated to increase significantly as a result of the proposed casino resort...”. The only mitigation offered is the implementation of a “Responsible Alcoholic Beverage Policy”. This is required by California law for all establishments selling alcohol and is not, in fact, a “mitigation action”. The conclusion of little impact is not supported by any substantive information and is preposterous.

Finally, I urge you to strongly consider the arguments previously articulated by the broad opposition to this project within Sonoma County, including the community, State and Federal officer holders, and the unanimous resolutions of opposition of both the Sonoma County Board of Supervisors and the neighboring town of Windsor.

**From:** Night Gardener <nightgardener@hotmail.com>  
**Sent:** Monday, August 5, 2024 4:36 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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## Laura Tapper

31 Ellie Drive  
 Santa Rosa, CA 95403  
[nightgardener@hotmail.com](mailto:nightgardener@hotmail.com)

August 5, 2024

Amy Dutschke, Regional Director  
 Bureau of Indian Affairs, Pacific Regional Office  
 2800 Cottage Way, Rm W-2820  
 Sacramento, CA 95823

Chad Broussard (via email)  
 Environmental Protection Specialist, Pacific Region  
 Bureau of Indian Affairs  
[chad.broussard@bia.gov](mailto:chad.broussard@bia.gov)

### **RE: EIS Comments, Koi Nation Shiloh Resort and Casino**

Dear Ms. Dutschke and Mr. Broussard,

I am writing as a direct neighbor to the proposed Koi Nation Shiloh Resort and Casino. By direct, I mean directly across Old Redwood Highway from the southeast corner of the intended property. I am a resident of one of the two mobile home parks that are next door neighbors to each other - Mobile Home Estates and Colonial Park, with Pruitt Creek running between the two parks.

### **I DO NOT WANT THIS CASINO!**

The **GENERAL NEIGHBORHOOD ENVIRONMENT** will be ruined for the residents of this unincorporated area and the entire town of Windsor. This is not the area/neighborhood for a development such as this. Currently, it is a residential/semi-rural/agricultural area. There are many single family homes adjacent to a popular town park, Esposti Park, at the intersection of Shiloh East and Old Redwood Highway that is used for little league baseball, soccer, family picnics and a stopping point for many cyclists traveling Old Redwood Highway. There is a County Regional Park also adjacent to the east of the site, used by residents from all over for hiking, dog walking, horseback riding. Both these parks add to the general family friendly atmosphere of the area. A casino will not add to this atmosphere that has been purposely cultivated with the current amenities.

**WATER** is an issue all over California and the surrounding properties mainly get their water from a well. A development of this size will negatively impact the water availability for all wells in the area. This includes the town of Windsor that currently has 2 wells located at Esposti Park that are used for municipal drinking water and irrigation. Mitigation payments to other private parties who have reduced water from their wells will not replace the water...you can't drink money! Additionally, between the two mobile home parks mentioned above runs Pruitt Creek. My understanding is there are plans for the casino to release wastewater into Pruitt Creek. Please note this creek is dry much of the year and floods during heavy rain. Is it also true that part of this creek, that also flows on the proposed casino site, will be rerouted and/or paved over? Is any of this responsible creek or source water stewardship? I think not.

**LIGHT, AIR AND NOISE POLLUTION.** A 24/7 lighted facility with a 400 room hotel, 5000 parking spaces and additional structures will add noise, light and air pollution that will disrupt the local population of people and wildlife.

**TRAFFIC** will be an issue. My understanding is the traffic study was completed during Covid when people were not going out as usual. How can that be used as an accurate measure for traffic impact? Old Redwood Highway is used as a second Highway 101 all day long! It is already difficult to exit or enter my park with the traffic, especially during the morning and all afternoon into

the evening. Proposed widening of Shiloh and Old Redwood Highway are not part of the cost which will be born by the casino and most traffic mitigation suggested is inadequate and unrealistic. This doesn't even touch on the issue of needing to evacuate should there be another fire - which is almost inevitable. Evacuation during the Kincade fire was next to impossible, with Old Redwood Highway, Shiloh, Hembree, etc and Highway 101 backed up, bumper to bumper in every direction. Add another 500 - 2,000 cars, depending on day and time of day and it will be impossible to manage! Remember, power was/will most likely be out and traffic and street lights weren't/won't be working! Traffic control will most likely not be available from Highway Patrol, County Sheriff, or town police - they will elsewhere.

Increased **CRIME** will be an issue. Statistics show, and we know firsthand from the Graton Casino, that crime is a factor. DUIs, drugs, public intoxication, prostitution, human trafficking, etc. will be introduced into our pleasant community. Who will bear the brunt of this or the cost to town and county policing services, or even for Highway Patrol?

**HEALTHCARE** will be impacted and felt by the local medical facilities, already stretched thin at Sutter Memorial Hospital and Kaiser, many still struggling after losing doctors and other medical professionals who left after losing homes in recent fires and the toll that Covid wreaked. This will impact all locals who rely on these services.

The **POWERGRID** will suffer! With climate change, our hot days are hotter and more frequent. AC usage already causes stress on our power grid and power outages will only get more frequent. The power used by the casino will drag an already fragile system and most likely cause rate hikes for this locals.

I'd also like to note:

- The tribes of Sonoma County, mainly the Graton and Lytonn Rancherias are opposed because the Koi's tribal land is in Lake County, not Sonoma.
- The mayor and town council of Windsor are opposed.
- Our state representatives, Jared Huffman and Mike Thompson are opposed.
- Dianne Feinstein and Alex Padilla, CA State Senators are opposed.

I urge the BIA to NOT APPROVE this project moving forward, Plan D in the EIS. I also urge the Koi Nation to consider building in Lake County to improve the employment opportunities and other benefits a casino might bring to their own tribal land.

Respectfully submitted,

Laura Tapper

**From:** Francois Jerins <fjerins@sbcglobal.net>  
**Sent:** Tuesday, August 6, 2024 11:15 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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ACT NOW! STOP THE CONSTRUCTION of any of the three varying proposals for A CASINO-HOTEL-EVENT CENTER-RESTAURANT at the CORNER OF SHILOH/ORH ( KOI NATION with OKLAHOMA TRIBE CORPORATE ANCING): FIRE! \* Loss of natural wildfire mitigation the current vineyards provide \* Dangerous obstruction issues evacuation safety and accessibility \* Mitigations" proposal for an on-site fire team deemed inadequate, potentially competing with already max-taxed local firefighter demands \* Increased threats to surrounding neighborhoods \* Accessibility along ORH, Shiloh, Hembree, Faught Road –major arteries to evacuation/medical WATER! \* Huge supply required to maintain the operation, potential drain, disruption to neighborhood \* Potential drain on neighbors' wells \* Sewage contamination \* Enforcement of codes or promises not guaranteed: Town of Windsor (TOW) and residents stuck with clean up and costs? Of failures \* Increasing possibility that alterations to the landscape might mean creek flooding onto ORH, trapping C.P. tenants TRAFFIC CONGESTION! \* Shiloh and ORH are already periodically congested, with new housing tenants coming \* Entering 101 already means awaiting a "green arrow" light \* We can't accommodate thousands more vehicles \* Interference with local travel to hospitals/doctors, schools, church, shopping, threats to life \* Danger to bicyclists, dog walkers, elders with canes, bus riders, parents/ school children NOISE! CRIME! DUI! \* Unimaginable! Sirens, horns, traffic, cars and trucks (1K loads of dirt to be hauled in)?! during construction \* Yahoos/drunks?! Non-resident thieving, fights \* Drunk drivers on our narrow 2-lane roads 24/7 PARKS USAGE! \* Little League safety at Esposti Park \* Local use daily impacted for all reasons listed \* Negative impacts on the thousands of visitors coming and going from Shiloh ( and Foothill) Regional Park: accessibility, safe evacuations \*Pollution, noise, DUI \* Loss of current long views from the Park Hills, looking west HEAT ISLANDS! \* Huge parking lot(s) increasing hot temperatures, impacting all us creatures in the vicinity LOSS OF HABITAT! \* Wildlife in the region will be negatively impacted, across the board... ECONOMICS?! \* Contrary to the prepared script read by many members of the Norcal Carpenters Union, there's no guarantee local workers will be hired during construction, after, or that wages would increase \* Might hurt local small businesses, and hiring pool \* Local Sonoma Tribes don't want competing business or establishment of a KOI Nation reservation here \* "Experts' disagree on tax revenue benefits THE EIS (Environmental Impact Studies) ASSESSMENTS \* Made pre-pandemic, may not reflect accurately, current conditions, needs for mitigation \* ARE KOI "NATIVE" TO SONOMA COUNTY? ENTITLED TO DO BUSINESS HERE? Oklahoma tribe is financing this \* "JURISDICTIONAL" LEGAL ISSUES FOR TITLE HOLDERS, OWNERS raised by local attorney SUPPORT OUR EFFORT TO STOP the BIA FROM ADOPTING ANY OF THE THREE PROPOSALS FOR THIS DEVELOPMENT, by rejecting the current Enviro Impact Studies submitted! Before AUG 26: Mail "no!" letters to (1) Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Regional Office, 2800 Cottage Way, Room W-2820, Sacramento, CA 95825 Include your name, return address, and the caption: "EIS Comments, Koi Nation Shiloh Resort and Casino," on the first page of your

written comments. ALSO: email to (2) Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, Pacific Region  Please use "EIS Comments, Koi Nation Shiloh Resort and Casino" as the subject of your email. Great website:

August 6, 2024

I103

To the Bureau of Indian Affairs

PACIFIC REGIONAL OFFICE

DEIS Comments, Shiloh Resort and Casino Project

2024 AUG -9 AM 10: 34

BUREAU OF INDIAN AFFAIRS

PLEASE DO NOT ALLOW A CASINO TO BE BUILT ON EAST SHILOH ROAD, SONOMA COUNTY, CALIFORNIA!

East Shiloh Road, at the present time, is a quite pretty small ranch area without heavy traffic.

West Shiloh Road which runs from Highway 101 North to Old Redwood Hwy has a busy shopping center with hardware stores, a Walmart, banks and many fast-food restaurants. The traffic in this area is very heavy, and there are many accidents, especially at the Shiloh Road and Old Redwood Hwy intersection.

Old Redwood Hwy which runs from Santa Rosa to Healdsburg has tremendously heavy traffic and many accidents with fatalities.

We built our home on Old Redwood Hwy in 1962 after Highway 101 North was opened, and Old Redwood Hwy no longer had major traffic. It was very peaceful living here for a few years until the town of Windsor began enlarging with housing, parks, stores, etc. Now Old Redwood Hwy has continuous heavy traffic with many wrecks, some with fatalities. There have been three deaths on the highway in front of our house, and several wrecks which ended up on our front lawn. Old Redwood Hwy is already the alternate route for many when Highway 101 is congested with traffic or an accident. We simply cannot accommodate the added traffic that an unnecessary casino will bring.

The Koi Nation is not native to this area. According to the history of Sonoma County, Wild Oats in Eden by Harvey J. Hansen & Jeanne Thurlow Miller, Sonoma County was occupied by Pomo, Miwok, and Wappo tribes.

PLEASE HAVE MERCY ON THE RESIDENTS OF THIS AREA AND DO NOT ALLOW A CASINO IN THIS AREA.

Sincerely,

*Marjorie Etchell*  
**Marjorie Etchell**

5645 Old Redwood Hwy.  
Santa Rosa, CA 95403

Karl Reynolds

1104  
AUG 12, 2024

6344 Stone bridge Rd

Santa Rosa Ca

95409

I am writing to voice my opposition to the KOI Plans to build a casino on Shiloh road in Windsor, CALIF.

1. The KOI People are not from Sonoma County.

2. The Project is being financed by a tribe from another STATE, and they stand to make the most from the casino.

3. Water resources are ALWAYS uncertain in Sonoma county and this project, if built, will use thousands of Gallons of water daily.

4. The roads in the proposed AREA are hardly able to handle traffic as it exists now. There is NO Room to widen these roads.

5. TRAFFIC From the BAY AREA will CONGEST the Santa Rosa section of Hwy 101 AS it has NEVER ~~has~~ experienced.

6. Sonoma county doesn't need Another casino. Period! How many counties already HAVE TWO?

Please respectfully deny this project.

Thankyou Karl Reynolds

**From:** Haley Rojas <rojas.haley@gmail.com>  
**Sent:** Tuesday, August 6, 2024 6:44 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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Dear Regional Director Dutschke,

I am a Tribal Citizen of the Federated Indians of Graton Rancheria and the purpose of this letter is to express my opposition to the Koi Nation of Northern California's project to establish trust land for gaming in Sonoma County, California. The Koi Nation, previously known as the Lower Lake Rancheria, submitted a restored lands gaming application to the U.S. Department of the Interior (DOI) for a parcel located outside the Town of Windsor, in Sonoma County. The proposed project location is over a 50-mile drive from the Koi Nation's ancestral and cultural roots!

Long story short, my tribe followed the rules. Koi nation MUST do the same for the good of all Native american people! Another fact is that the Koi tribe claimed to have worked with general Vallejo however there are no accurate documentation! Our tribe documented and recorded our HARD work we did for and with general Vallejo!

I would greatly appreciate you to consider another location for the Koi nation casino in THEIR ancestral territory home lands. Otherwise this project should be denied.

respectfully,

Haley Rojas -Proud member of the Federated Indians of Graton Rancheria!

**From:** Donnar <rdram@sonic.net>  
**Sent:** Wednesday, August 7, 2024 8:37 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, KOI Nation Shiloh Resort and Casino

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Chad Broussard  
Environmental Protection Specialist  
Bureau of Indian Affairs, Pacific Region

Dear Mr. Broussard,

I am writing In opposition to the Koi Nation Casino to be built in Windsor, California. I feel that the proposed casino will have a negative effect on the community of Windsor, Santa Rosa and surrounding neighborhoods.

The casino is not supported by local residents and local leaders. Windsor is a small, well established community where many families thrive. This project is just not a good fit for the area. The town of Windsor has recently built 2 new apartment complexes that contain approximately 370 apartments, a few years ago 2 other apartment complexes were built in the same area. Our community is already concerned about the strain this growth puts on our resources. I cannot imagine what a strain such a large project would have on resources.

There are many concerns regarding this project:

- \* First and foremost the Koi Nation Tribal land is not located in this area, the tribe is not originally from Sonoma County. Their original land is from Lake County, I feel they should build in their own tribal area.
- \* Water supply, our area has been concerned with drought issues.
- \* Sewer waste issues.
- \* Environmental concerns, pollution to area.
- \* Increased traffic.
- \* Noise for residential neighborhoods.
- \* Wildfire concerns.
- \* Crime
- \* Casino not in General Plan for area.
- \* Global warming. Our state is supposed to be working towards improving the effects of atmospheric conditions and as native people we should be working towards improving the land not further damaging it.
- \* Gambling not good influence for future generations.

The Bureau of Indian Affairs must consider areas in which casinos are being placed and must help us respect "tribal territories". Other casinos have been developed in areas that were not residential, if patrons want to gamble they "will" travel to a casino. River Rock, Graton, Thunder

Valley, and Cache Creek were all built in nonresidential, unpopulated areas and are very successful, beautiful casinos.

Sometimes it is “not all about the money”, it is about the quantity of life for people and residents of our state.

Thank you for your consideration of my letter.

Regards, Donna Ramirez  
Tribal Elder  
Cloverdale Rancheria of Pomo Indians

UNIVERSITY OF CALIFORNIA, SANTA CRUZ

PACIFIC REGIONAL OFFICE

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2024 AUG -9 AM 10: 26



SANTA BARBARA • SANTA CRUZ

DEPARTMENT OF ANTHROPOLOGY  
SANTA CRUZ, CALIFORNIA 95064

BUREAU OF INDIAN AFFAIRS

TELEPHONE (831) 459-2615  
FAX (831) 459-5900

From: Tsim D. Schneider, Ph.D.  
Department of Anthropology  
University of California, Santa Cruz  
1156 High Street  
Santa Cruz, CA 95064

To: Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

August 7, 2024

**Re: EIS Comments, Koi Nation Shiloh Resort and Casino**

Dear Regional Director Dutschke,

My name is Tsim Schneider. I'm an enrolled Citizen of the Federated Indians of Graton Rancheria, the federally recognized tribe of Coast Miwok and Southern Pomo people whose ancestors faced and survived multiple phases of colonial violence and displacement by missionaries, soldiers, and settlers from Spain, Mexico, Russia, and the United States. I am also an Associate Professor of Anthropology at the University of California, Santa Cruz, where I teach courses on archaeology, colonialism, and Indigenous peoples of California. I am writing to protest Koi Nation's proposal to build a resort and casino at 222 E. Shiloh Road in Santa Rosa, California. To be certain, I have no issue with Koi Nation exercising their sovereign rights under federal law to obtain economic independence and support Koi Nation community membership. **I am calling into question Koi Nation's performance of sovereignty on – and cultural and historical claims to – Indigenous land that is not theirs but is instead a known place within the traditional territory of the Federated Indians of Graton Rancheria, the federally recognized Tribe of Coast Miwok and Southern Pomo people.**

Our history and connection to that place and the surrounding area are unquestionable. Since time immemorial the societies and economies of Coast Miwok speaking peoples and Southern Pomo peoples intersected amicably along the Russian River corridor, Laguna Santa Rosa, and Santa Rosa Plain. As documented by ethnographers, outsiders (neighboring Pomo, Wappo, and others) may have been granted safe passage to the coast and permission to gather food and raw material. However, these interactions were ephemeral, and they do not represent deep ties or equivalent claims to the land. The Koi Nation presents a "Pomo expansion model" to argue their "primacy" in southern Mendocino County and northern Sonoma County. The model attests to the ancient history of Pomo peoples and a homebase in the eastern Clear Lake basin. The archaeological and linguistic evidence appear to suggest a migration of Pomo peoples west from Clear Lake toward the Russian River around 2,500 years ago, representing the beginning of new and *different* Southern and Southwest Pomo cultural traditions and distinct languages. **This evidence does not give the modern Koi Nation of eastern Lake County the right to now claim the spaces that their distant (and distinct) relatives occupied for at least 2,500 years.** It would be similar to someone who speaks Turkish claiming land in France because Anatolian languages were the first to split from a shared Proto Indo-European

August 7, 2024

language family. In this instance, supporting Koi Nation's startling claims would harmfully overwrite the unique histories, languages, and cultures of the Southern and Southwest Pomo peoples. A dangerous precedent for California Indian Country would also be set.

The Shiloh Road property is part of a place that reflects the unique postcontact history of our Tribe, not Koi Nation. As my research shows, my Tribe is one with ancient and unassailable ties to the land—a territory where our ancestors are buried, where our traditions are kept alive, and where our families continue to gather in community. Koi Nation's website presents a history of Euro-American contact and colonization centered on their traditional home 50+ miles away in eastern Lake County during the mid- to late-1800s, a brutal era of United States settler colonialism and military violence. "As a result," they state, "the Koi Pomo then came to live in communities along the Russian River Valley from Sebastopol to Clear Lake"—a known place, the statement overlooks, for Southern Pomo and Coast Miwok families who have always called it home. Since the late-1700s, by contrast, the ancestors of present-day Graton Rancheria Citizens faced – and resisted – sequential waves of Euro-American colonization by representatives of Spain, Mexico, Russia, and the United States. **For each iteration of greed, land theft, and violence, our ancestors remained connected to their traditional lands and cultural traditions, and they sustained those connections even while families were being pulled apart.** Some fled San Francisco Bay missions seeking protection in their traditional lands. Others evaded wandering padres and soldiers—intruders bent on taking away our land, our bodies and spirits, and our way of life. Still others negotiated settler court systems to gain title to land at Olompali and Nicasio, or defiantly remained living on family homesteads before being gathered together as "homeless Indians" at the Graton Rancheria in the early 1900s.

Tsupu, an ancestor for many Graton Rancheria Citizens including me, fled Rancho Petaluma for the Russian mercantile colony of Fort Ross on the Sonoma County coast sometime between 1834 (when Rancho Petaluma was established) and 1841 (when Fort Ross was sold). To do so and to evade capture, Tsupu chose a route as only a local with knowledge of the land would have been able to do. Her survival and her traditional cultural and ecological knowledge of the land paved the way for her children and grandchildren. More recently, one of Tsupu's great grandkids (and my great grandmother) was born to a Coast Miwok father and a mother who proudly identified as "Pomo" on the 1928 "California Indian Enrollment Application" and hailed from the Healdsburg area (approximately 10 miles north of Shiloh Road). Photographs of family get-togethers at the Russian River and other southern Sonoma County places in the early 1900s—indeed the entire Graton Rancheria Tribe of Coast Miwok and Southern Pomo people—reflect all of the places our ancestors lived, worked, resisted, and remained connected to at all cost. **The history I know, as a Native person and a professional anthropologist, is not Koi history.**

Koi Nation's proposal dishonors the locally-specific Native history of that Southern Pomo place as well as the sovereignty of the rightful descendants, the Federated Indians of Graton of Rancheria, who continue to honor their history and steward their traditional territory of southern Sonoma and Marin counties. In simple terms, 222 E. Shiloh Road is not their land.

Thank you,



Tsim D. Schneider, Ph.D.  
Santa Cruz, California

CC: Chad Broussard, Environmental Protection Specialist, Bureau of Indian Affairs, Pacific Region

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

PACIFIC REGIONAL OFFICE  
2024 AUG 12 PM 12:04  
BUREAU OF INDIAN AFFAIRS

I108

August 8, 2024

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

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

I am writing to you as I am a citizen of Windsor, California. I participated on the zoom call on July 30, 2024 at 6 PM. A majority of the people who were on the call were against having a casino built at the proposed location. Both Town Council of Windsor and Santa Rosa are against having a casino built

Here are the many issues brought up:

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

The land has always been for Residential, agricultural and limited commercial use as mentioned in your EA report. It has Pruitt Creek that runs through the property and floods every year. The road is only a two lane road and would cause extreme problems for the citizens who live nearby if and when they have a fire, earthquake or other natural disaster. The proposed casino stated in their Environmental Impact report expects to have approximately 2,000 to 5,000 people traveling on Shiloh Road each day. This could be the equivalent of 2500 cars each day.

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

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

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

During the proposed construction phase lasting from 2023 until the opening date of 2028, the large construction trucks and workers building from 7 am until 5 pm will create a lot of noise, traffic congestion and increase smog in the area.

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

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

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

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

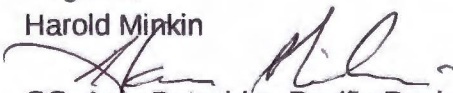
The needed water of 170,000 gallons per day of potable water and 108,000 gdp of recycled water. Potable water supply would be provided via on-site wells, and recycled water (tertiary treated effluent) would be provided from the on-site wastewater treatment facilities (see Section 2.1.4). Recycled water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

Another item mentioned in the report is that the casino would be located in a "high fire zone". I did not find where the Koi Nation would be building a fire station nearby. Other major concerns are how to get all the people safely evacuated. Regarding emergencies it is stated you will **ONLY** have three employees trained as a firefighter and EMT. ***This will NOT be enough workers to assist in case of an emergency***

Both the council members of Sonoma County, including Santa Rosa and Windsor are opposed to having this casino built. The Graton and Dry Creek Pomo tribes have also stated they are against the casino. Many callers from union construction companies that were told they would be hired by the Koi Nation were the very few in favor of the casino.

***I am hoping the Koi Nation decides to do 3.13.3.5 Alternative D: No Action Alternative***

Regards,  
Harold Minkin



CC: Amy Dutschke, Pacific Regional Director

Chad Broussard, Environmental Protection Specialist, Deb Haaland, Secretary of the Interior

**From:** betsy mallace <[betsymallace@yahoo.com](mailto:betsymallace@yahoo.com)>

**Sent:** Wednesday, August 7, 2024 9:08 AM

**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>

**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino extension request

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Hello,

I am requesting a 30 day extension to submit my public comments for the EIS. I forgot to mention this when I called into the public meeting to make my verbal comments.

Please confirm an extension has/will be granted.

Thank you,

Betsy Mallace

[betsymallace@yahoo.com](mailto:betsymallace@yahoo.com)

707-836-1576

847-971-0716 cell

August 8, 2024

PACIFIC REGIONAL OFFICE

2024 AUG 12 AM 11:23

BUREAU OF INDIAN AFFAIRS

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

**RE: EIS COMMENTS—KOI NATION'S SHILOH RESORT AND CASINO**

I am a Tribal Citizen of the Federated Indians of Graton Rancheria (FIGR), located within the Wine Country of Sonoma County and I vehemently oppose the Koi Nation (a Lake County Pomo tribe from more than 50 miles away), applying for Fee-to-Trust status to take land from *our* ancestral territory—for the purpose, not only of a reservation far from their original home, but to establish a casino *in my backyard* to directly compete with two tribal casinos already established within a 20-mile radius from me.

I was born and raised here in the heart of Wine Country—this is a county of limited space, extremely unaffordable housing with low inventory, prime agricultural land and rampant, world-renowned wine tourism. It's a place I've witnessed change beyond recognition from the humble farming community I roamed on horseback as a child. There is no room here for reservation shopping and unlimited casinos. This project is proposed on an intersection between single family homes and open vineyards in the small, congested Town of Windsor. I cannot think of a more inappropriate place to build any kind of large commercial project, even by a tribe that actually belongs here.

Setting a precedent that is opposite to a long standing tribal and federal government tradition is a dangerous affair, with repercussions for both sides. This is an attempt to erode tribal sovereignty—historically not a new concept. However, this tribe nor the ones funding or supporting them seem to realize the consequences of losing our status as sovereign nations. No, money and greed is the motivator here—not the history nor honor of our ancestors. Allowing tribes to take land into trust for casinos wherever their members traveled for work or trade means that our own tribe could establish a casino in San Francisco. Is that what the BIA really wants? Tribes across wide geographical areas traded regularly with each other and socialized/married outside of their immediate point of origin, but that does not mean that was their home—the same way traveling to France does not automatically make you a citizen. My own grandparents met traveling on the road picking hops and prunes; sometimes living in different areas for extended periods for work—but they knew where Home was. This action would also infringe on the cultural, historical, and territorial rights of other tribes in Sonoma County such as the Dry Creek, Lytton, and Cloverdale Rancherias and drastically impact any future economic projects they should pursue.

The DOI is obligated to uphold the existing laws established by the long tribal and federal government relationship. The Koi Nation must also follow these laws and seek a reservation in their own ancestral territory, in their true and original homeland of Lake County. This is something we were required to do as well. It should be no different for any other tribe.

Respectfully,

  
Angela D. Penland, FIGR Tribal Citizen  
PO Box 131  
Windsor, CA 95492  
707-670-0333



8/1/2024

**STATEMENT FROM GREG SARRIS, TRIBAL CHAIRMAN, FEDERATED INDIANS OF GRATON RANCHERIA ON THE PROPOSED SHILOH CASINO PROJECT IN WINDSOR, CA**

The Koi Nation seeks to establish Trust land in Windsor, CA, with the express purpose of building a casino resort. Federated Indians of Graton Rancheria (FIGR) vehemently oppose this action, as the lands in question sit within our federally assigned ancestral homeland. This action threatens to set a dangerous precedent against Tribal sovereignty with implications for tribes in California and nationally.

Detailed anthropological, archeological, and linguistic research, as well as our family oral histories, clearly establish the fact that Koi Pomo Nation with its historic territory in eastern Lake County has no claim in any manner to our territory. In fact, their customs as well as their language were and are totally different from those of the Southern Pomo, our ancestors. Their aboriginal lands, on which their rancheria was established, are fifty-nine (59) miles from the site they claim in Windsor and their historic territory. The Koi claim their ancestors had a history of trading with our ancestors, which may or may not have been true. While all tribes traded with one another, traditional territorial boundaries were – and should be today – strictly respected. Permission for a tribe to cross another tribe's territory, say if an eastern tribe wanted to make a trek to the ocean, could only happen after the latter tribe gave permission to cross its territory. Not asking permission to cross, disrespecting tribal boundaries, most certainly resulted in war, often in the form of "poisoning" the offenders.

Further, there is no logic that just because one's ancestors traded with another's ancestors (from a different tribe), that the descendants can claim that they have a right to settle on the territory of the people they traded with. For example, if you came to my grandmother's backyard to trade your carrots for my grandmother's apples, that does not mean you can come and claim my grandmother's backyard as your own today – which is exactly the claim Koi Nation of eastern Lake County is making.

Their claims of historic connection are flawed and if accepted by the Department of Interior (DOI), would set a dangerous precedent for all California Indians – in fact, for all Indian Nations -- not only creating the reality of a casino on every street corner, but, no doubt as a result, also creating a major challenge to what currently constitutes our sovereignty as federally recognized Indian nations.

Koi Nation falsely claims that our Southern Pomo land is part of their aboriginal territory even while currently giving tours of Anderson Marsh in Lake County, describing to people how the Lake County region is their aboriginal home.

The Koi tribe uses post-European contact history as a way to establish "a deep historical connection to the land," which the Department of Interior (DOI) uses as a requirement for a tribe to take land for its use (i.e. for a casino) into Trust. They claim, for instance, that they have a history of working for General Vallejo, which would have been sometime between 1824 and 1850 (when California became a state). For the record, ever since first contact with the Spanish (before the Mexican revolution and secularization of the missions), California Indian people were forcibly moved into missions both far and near to their aboriginal homelands. We (FIGR), too, worked for

General Vallejo. But before that, we have detailed and well documented history of our Coast Miwok and Southern Pomo ancestors forcibly removed from what are today known as Marin and Sonoma Counties into Mission Dolores (in present day San Francisco), and into missions in Santa Clara and San Jose, all of which are in the true aboriginal homelands of Ohlone Nations. Using the Koi claim of working for General Vallejo as a deep significant historical connection to the land, means that almost any Northern California tribe could violate Ohlone Nations rights and disrespectfully apply for Trust status on their lands – and ultimately build casinos from downtown San Francisco to San Jose and all over Oakland and the East Bay.

The DOI has never taken land into Trust for a tribe further than 15 miles from its aboriginal territory, or from where its first U.S. established reservation was located. Once again, Koi is seeking to take land into trust 59 miles from its aboriginal territory. This illegal land grab is not limited to the Koi – the Scotts Valley Pomo, also from Lake County – is seeking to take land into Trust in Vallejo, which is Wintun territory, over 60 miles from Scott's Valley territory in Lake County. Koi, by the way, attempted to take land into Trust in 2012 next to the Oakland Airport, claiming they had a "deep connection to the land". Also, once again using the claim that they had worked for General Vallejo.

It is evident that if the 15 mile precedent is broken and tribes can muddle what constitutes a "deep connection to the land", a new precedent will be set whereby, as a result of our Spanish, Mexican, and early American history, we as California Indian people will be able to make claims just about anywhere to establish Trust land and build casinos on every street corner in the state of California – and everywhere else in this country for that matter. Such a scenario is certainly not what Californians want and will certainly turn public opinion against us and our businesses, which, as history has shown, results in federal laws that can and will challenge our sovereignty.

It is true that the 1910 California Indian Rancheria Act created to provide sovereign homes – rancherias, reservations – for the homeless Indians of California – often bundled aboriginal tribes and villages together, thus sovereign nations from specific locations of survivors were created. Approximately 15.5 acres of land northeast of Sebastopol (Graton) was set aside for the "homeless Indians of Tomales Bay, Bodega Bay, Sebastopol, and the vicinity thereof." In other words, the Coast Miwok and Southern Pomo survivors of the historic genocide, were given land and recognized as a sovereign nation. Yes, we lost the land, as many of the rancherias/nations did, as a result of the 1958 California Rancheria Termination Act. We were illegally terminated, which the federal government acknowledged when President Clinton signed our Restoration Bill on December 27, 2000. We applied to put land into Trust (a new reservation in Rohnert Park), which is approximately 7 miles from our original reservation in Graton – NOT 59 MILES! We stayed both within the territory where our people have a true "deep historic connection to the land," and within the 15-mile precedent established by the DOI for taking land into Trust for a landless tribe. We followed the rules. Koi and Scott's Valley must do the same for the good of all American Indian people.

Please join us and make your voice heard on this issue. Here's how to communicate with the Bureau of Indian Affairs:

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W — 2820  
Sacramento, CA 95825

Or email to:  
Chad Broussard  
Environmental Protection Specialist  
Bureau of Indian Affairs, Pacific Region  
[chad.broussard@bia.gov](mailto:chad.broussard@bia.gov)

Please write "EIS Comments, Koi Nation Shiloh Resort and Casino" on the first page of written comments, or in the subject line of your email.

PACIFIC REGIONAL OFFICE



2024 AUG 16 PM 1:56

BUREAU OF INDIAN AFFAIRS

Dan Takasugi &lt;dtakasugi@gmail.com&gt;

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**EIS Comments, Koi Nation Shiloh Resort and Casino**

1 message

**Dan Takasugi** <dtakasugi@yahoo.com>

Thu, Aug 8, 2024 at 9:09 PM

To: "chad.broussard@bia.gov" &lt;chad.broussard@bia.gov&gt;

**To:**

Amy Dutschke  
Regional Director  
Bureau of Indian Affairs, [Pacific Region](#)  
[2800 Cottage Way, Sacramento, CA 95825](#)

**From:**

Dan Takasugi  
[7500 Rafanelli Lane](#)  
[Windsor, CA 95492](#)

**Subject: EIS Comment, Koi Nation Shiloh Resort and Casino**

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

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

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

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

1. First, 2022 was not that long after the Covid pandemic, during which many local businesses were still encouraging and allowing work from home. This decreased the 2022 daily trips throughout this region of Sonoma County, but has now (2024) rebounded to pre-pandemic levels and possibly higher.
2. Second, it is not clear whether the TIS incorporated traffic counts from the currently constructing Shiloh Crossing apartment development located at 295 Shiloh Road. The project includes a total of 173 apartments and 8,000 square feet of commercial space. Other approved development projects and their expected trip counts should also be incorporated into the existing traffic conditions.

3. ADT counts were taken in July of 2022. This is a season when schools are typically not in session, nor are many after-school activities. A better peak time for ADT counts would have been in April or September of a given year.

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

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

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

Thank you for your consideration of this comment.

Dan Takasugi  
7500 Rafanelli Lane  
Windsor, CA 95492



PACIFIC REGIONAL OFFICE

2024 AUG 14 AM 11:44

BUREAU OF INDIAN AFFAIRS

Anne Devlin  
50 Plymouth Way  
Santa Rosa, CA 95403

August 11, 2024

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

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

Re. EIS Comments, Koi Nation Shiloh Resort and Casino

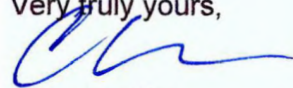
Dear Ms. Dutschke and Mr. Broussard:

I reside 500 yards from the above proposed project's entrance, and I urge the BIA to reject the conclusion in the draft EIS published July 8, 2024 to the effect that adverse environmental effects could be mitigated.

- The project would subvert the County of Sonoma's zoning plan and commitment to residents to preserve open space and agricultural use.
- The EIS does not assess the project's potential increase of need for law enforcement and emergency services or address the capacity of local agencies to supply services. In this county area outside city limits, we don't even have patrol. The county law enforcement does not enforce traffic, and we have only the CHP, whose cars are on the freeway rather than on our two-lane roads. "Proposing to enter into a contract" for law enforcement and emergency services is not meaningful.
- The proposals concerning restriping pavement don't address the inadequacy of the width of the roads to add lanes.
- No amount of disaster preparedness is going to change the fact that there aren't enough roads to evacuate the increased population of the proposed projects.
- "The use of BMPs would minimize impacts...no mitigation required", repeated, seems facile. The practices are not defined or described. No one who lives in the neighborhood believes that any version of this project would be insignificant.

Please don't allow a casino or hotel here. Thanks for your consideration.

Very truly yours,



Anne Devlin

**From:** gary hodes <trinitoid469@gmail.com>  
**Sent:** Wednesday, August 7, 2024 11:25 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, KOI Shilo resort and Casino

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

Greetings Mr. Broussard,

My name is Gary Hodges, I am a citizen of the Federated Indians of the Graton Rancheria of Sonoma County. I recently attended the comment session on a zoom meeting for the proposed project.

I would like to be on record stating that I believe in inter tribal collaborations and support efforts of all nations to do what's best in furthering economic development. However, this proposed project will open the doors to possible deterioration of tribal sovereignty which should be heavily considered in the BIA's overall assessment.

Allowing the KOI Nation the ability to collaborate with the Chickasaw Nation to move forward with this project at the proposed location, allows The KOI nation to trespass on ancestral lands of neighboring tribes.

Thank you for your consideration.

Sincerely, Gary Hodges

August 13, 2024

PACIFIC REGIONAL OFFICE

2024 AUG 15 AM 11:16

BUREAU OF INDIAN AFFAIRS

I114

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento CA 95825

**Subject: EIS Comments, Koi Nation Shiloh Resort and Casino**

Dear Regional Director Dutschke,

As an 80 year old elder of Federated Indians of Graton Rancheria, I am writing to ask for protection of my tribe sovereignty.

As a child spent time with my Uncle Tom Smith and mother on the fishing piers in Bodega Bay.

The Koi Nation is far from my ancestral homeland.

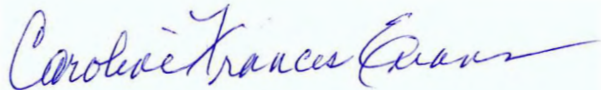
Please protect Tribal Citizens to their ancestral territories and not undoing tribal sovereignty. By allowing the Koi Nation to undo tribal sovereignty, you will be removing our ancestral homelands.

Please do not undermine my tribe sovereignty and detriment my identity and Cultural rights of federally recognized tribes in Sonoma County.

Please consider another location for the Koi Nation casino in their ancestral Territory in **Lake County**.

This project should be denied.

Respectfully,



Caroline Frances Evans  
260 Corral de Tierra RD.  
Salinas, CA 93908

August 13, 2024

PACIFIC REGIONAL OFFICE

2024 AUG 16 PM 1:57

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

**Subject: EIS Comments, Koi Nation Shiloh Resort and Casino**

Dear Regional Director Dutschke,

I am writing to express my strong opposition to the Koi Nation's proposed project to establish trust land in Windsor, California, for the purpose of building a casino resort. I am a Sonoma County Indian and resident, and an enrolled member of the Federated Indians of Rancheria, Sonoma County has been home to my people for generations.

The Koi Nation has every right to assert their legal rights as an indigenous tribe within their own territory in Lake County. However, their attempt to establish trust land in Sonoma County is deeply concerning. Our tribal lands hold immense cultural and historical significance. The Sonoma County Tribes have protected and preserved these lands for countless generations. The Bureau of Indian Affairs (BIA) should consider another location for this project in the Koi Nation's ancestral territory.

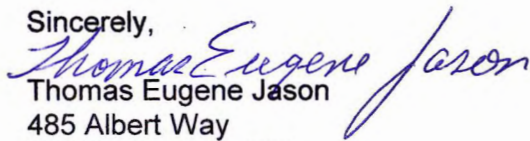
BIA must adhere to established rules regarding restored lands. Ignoring our sovereignty and lands given to us by the federal government under the 1910 California Rancheria Act and allowing the Koi Nation to encroach upon our territory disrespects our heritage and our rights as federally recognized tribes. The BIA would be taking away the very sovereignty that they are supposed to protect.

The Koi Nation's historical and cultural connections are rooted in Lake County, *not* Sonoma County. Their customs, language, and traditions are distinct from those of the Southern Pomo tribes like mine. The Koi Nation's claims of historic connections based on trading interactions are flawed. Trading goods with another tribe does not grant territorial rights. Such interactions were common among tribes but did not imply ownership or rights to the land.

This project would have significant effects on the sovereignty of my Tribe and our cultural resources. I urge the BIA to consider alternative project sites for the Koi Nation that do not infringe upon the cultural and sovereign lands of other tribes. Protecting tribal sovereignty and cultural resources is not just a legal obligation, but a moral one.

Thank you for your attention to this matter.

Sincerely,

  
Thomas Eugene Jason  
485 Albert Way  
Petaluma, CA. 94954

**From:** Alexander Coughlin <alexandercoughlin@gmail.com>  
**Sent:** Wednesday, August 7, 2024 2:43 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

Dear Mr. Broussard,

I am a tribal citizen of the Federated Indians of Graton Rancheria.

I write to you to express my utmost concern with the casino being proposed in Sonoma County by the Koi Nation.

The Koi Nation has no ancestral ties to the area they are proposing this massive development. They are native to an area in Lake County, over 50 miles away from the site they now claim as theirs. In fact, they are trying to mislead you and the rest of the Bureau of Indian Affairs by claiming they have historic ties to an area where Southern Pomo lived for thousands of years and hope that by conflating the terms "ancestral" and "historical" they can create enough confusion as to undo long held precedent about what Indian tribes may claim as their territory.

In doing so, they risk creating a scenario where any tribe could argue that any sort of historical connection their ancestors had at any point to any location entitles them to take land there into trust and build casinos. For example, my Coast Miwok ancestors were brought by Spanish missionaries to San Francisco as slaves for Mission Dolores. Does that entitle my tribe to build casinos in San Francisco even though it's outside our ancestral territory? Furthermore, my family has now lived in San Francisco for five generations going back over 100 years. Does that entitle us to call this our ancestral land? Where does "history" begin and end?

This will be a nightmare if it is allowed because it will be a mad dash for all tribes to propose casinos all over the place and will result in extreme amounts of conflict between otherwise cooperative tribes and will pejoratively affect all Native Americans in the state.

All tribes should be entitled to self-determination and economic development within their ancestral territory. Since the Koi Nation's proposed casino and resort falls outside their ancestral territory and infringes on the territory of other tribes, it should be denied.

Respectfully,

Alexander Coughlin

550 Davis Street #48,  
San Francisco, CA 94111

From: **Broussard, Chad N** <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
 Date: Wed, Aug 7, 2024 at 4:40 PM  
 Subject: Re: [EXTERNAL] notification of hearing and deadline for comment on Koi Nation Shiloh Resort & Casino  
 To: catherine dodd <[catherine.dodd@gmail.com](mailto:catherine.dodd@gmail.com)>

In order to ensure full consideration and consistent responses I will consider these questions comments on the Draft EIS and will provide responses with the Final EIS.

Sincerely;

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

Phone: 916-978-6165  
 Mobile: 916-261-6160

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**From:** catherine dodd <[catherine.dodd@gmail.com](mailto:catherine.dodd@gmail.com)>  
**Sent:** Wednesday, August 7, 2024 4:36 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** Re: [EXTERNAL] notification of hearing and deadline for comment on Koi Nation Shiloh Resort & Casino

Chad,  
 Thank you for letting me know. Couple of questions.  
 I was on the July 30 call and someone said that the DEIS consultants were hired by the KOI tribe - is that true?  
 I have a question about commenting - is the DEIS concerned only with the impacts in the exact property line of the project or is it the nearby environment as well?  
 Thanks for your hard work.  
 May you be well,

Catherine Dodd PhD, RN

On Wed, Aug 7, 2024 at 4:05 PM Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)> wrote:  
 With regard to your request for an extension for the review of the Draft EIS for the Koi Shiloh Resort and Casino Project we are not granting extensions at this time.

Sincerely;

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

Phone: 916-978-6165  
Mobile: 916-261-6160

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**From:** catherine dodd <[catherine.dodd@gmail.com](mailto:catherine.dodd@gmail.com)>  
**Sent:** Friday, July 19, 2024 8:05 PM  
**To:** Broussard, Chad N <[Chad.Broussard@bia.gov](mailto:Chad.Broussard@bia.gov)>  
**Subject:** [EXTERNAL] notification of hearing and deadline for comment on Koi Nation Shiloh Resort & Casino

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Chad.

For some reason, I did not receive the written notification of the upcoming hearing and deadline for comment on the latest EIR. I saw it in Supervisor Gore's newsletter.

This is a very short time frame for residents who do not have expertise in Environmental Review to read, digest and comment on a **270 page technical document with an additional 5699 pages of appendices**. It's also the middle of summer and many people are on vacation.

I respectfully request that the deadlines for the zoom meeting and the comment period be extended.

May you be well,

c.

Catherine Dodd PhD, RN [FAAN](#) she/her

Board Member [Commonweal](#)

Board Member [National Committee to Preserve Social Security & Medicare Join TODAY](#)

Advisor, Families Advocating for Chemical and Toxic Safety [FACTS](#)

**From:** DennyB <db6478@att.net>

**Sent:** Wednesday, August 7, 2024 8:21 PM

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

**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

Chad Broussard  
Environmental Protection Specialist  
Bureau of Indian Affairs, Pacific Region

Dear sir;

I don't see how the BIA could even consider allowing an Indian Casino in this residential neighborhood. Just from the point of Wildfire Evacuation, it will be so backed up that people are going to be burned to death in their cars, trying to get out.

I listened to the ZOOM meeting on Tuesday July 30, 2024, the only people that were for the project, stood to gain financially and they would not have to live with it later. You could hear the carpenters that called in, were reading from talking points they were given. With the carpenters that called in by phone, it would show the area code they were calling from. Many times it was area 209 and 510, not even close to this residential area.

In fact the only carpenter that called in, said he lived on Faught Road, which is close, but still not right next to it.

There are no casino's in residential areas in Sonoma County, the Graton Casino is in the commercial area of the city of Rohnert Park and River Rock Casino is in the hills East of Geyserville.

The Koi Nation is reservation shopping and trying to get closer to the Bay Area, but they are from Lake County.

The Town of Windsor, the Sonoma County Supervisors, and even our Congressman and the late Senator Feinstein are all against the Koi Nation Casino in Sonoma County, doesn't that count for something?

I am hoping the BIA has not made up it's mind already and is just going through the steps to look like there is still a chance of rejecting the project.  
My cousin thinks the BIA has been paid off by the Chickasaw Nation from Oklahoma and the casino is going to be built, even though everyone is against it.

I am hoping that isn't so, and the BIA will reject the Casino.

Dennis Blasi  
Oak Creek Subdivision  
[jdn3223@att.net](mailto:jdn3223@att.net)

pg. 1  
August 13, 2024

1119

To: Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific  
Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

Subject: EIS Comments, Koi Nation  
Shiloh Resort and Casino

I am a Tribal Citizen of the Federated  
Indians of Graton Rancheria and the  
purpose of this letter is to express my  
opposition to the Koi of Northern California's  
project to establish trust land for  
gaming in Sonoma County, California.

The Koi Nation, previously known as  
the Lower Lake Rancheria, submitted  
a restored lands gaming application  
to the **U.S.** Department of the Interior  
(DOI) for a parcel located outside the  
Town of Windsor, in Sonoma County.  
The proposed project location is over  
a 50-mile drive from the Koi Nation's  
ancestral and cultural roots in the  
Lower Lake area of Lake County, where  
its historic rancheria was located.

DOI is supposed to protect tribal sovereignty  
and this precedent setting proposal by the  
Koi Nation is actually underdoing tribal  
sovereignty. DOI is now being put in the

position of pitting Indians against Indians here in California. Our tribes were not removed from their ancestral homelands, like tribes in Oklahoma. In California, tribes were not removed, but were decimated in place. As my Tribe and others rebuild, our Tribal Citizens are returning to their ancestral territories.

DOI must consider an alternative location for the Koi Nation in their true homeland in Lake County. DOI would be wrong to allow for Koi Nation to jump unto another tribe's by trying to demonstrate a significant historical connection to our Southern Pomo territory based on trade routes or one family moving to our territory. Koi Nation's application is simply a new twist on their previous efforts to acquire gaming sites outside of their ancestral territory, which DOI was correct to deny on the same grounds.

I support the right of all tribes to restore their homelands and pursue gaming on those lands. I cannot, however, support this project, it undermines tribal sovereignty and would be to the detriment of the identity, sovereignty, and cultural rights of the federally recognized tribes in Sonoma County.

I would greatly appreciate you considering another location for the Koi Nation Casino in their ancestral territory in Lake County. Otherwise, this project should be denied.

Respectfully and Sincerely,  
*Natalie Pulido*

Natalie Rose Pulido  
P. O. Box 8624  
Lancaster, CA 93539

Aug. 14, 2024 1120

PACIFIC REGIONAL OFFICE

2024 AUG 19 PM 3:47

BUREAU OF INDIAN AFFAIRS

Comments, Koi Nation  
Shiloh Resort and Casino

Dear Ms. Dutschke,

We are writing to you to tell you  
That we oppose the above named resort and  
casino.

We have lived in <sup>the</sup> Darkfield since 1989 (35 years)  
Where we own a home and raised our 2 children.  
We feel a strong bond to our neighborhood  
in the unincorporated area between Santa Rosa and  
Windsor with its semi-rural atmosphere. The  
proposal to build the casino resort about  
one mile north of our home was a shock!

The neighboring area is a mix of vineyards, some  
small commercial and many residential single  
family homes and several mobile home parks  
(home to many elderly residents). In addition, a  
large apartment structure is nearing completion  
diagonally to the proposed project and another  
one north of Espositi Park has just broken  
ground.

Espositi park (where many youth sports take place)  
is directly across Shiloh Rd. from property  
and San Miguel Elementary School is  
less than a mile south on Fought Rd. We  
feel a casino project so close to important  
youth activities and education would create  
a danger to our children.

We worry that traffic on our narrow  
roads would be severely impacted for  
daily work and school commutes.

The property is adjacent to a beloved regional park, Shiloh Park, frequented by locals and home to native wildlife. This entire area is at high risk for yearly wildfires in summer and fall. We locals face each fire season with serious apprehension since 2017 when the Tubbs fire roared west from Napa Valley towards us with little to no warning. That night in October 2017 we fled our home in middle night and became refugees - not knowing where we should go. Since then, a warning system and evacuation zones have been established but we truly face each fire season with dread as these wildland fires have become unpredictable and not easily contained. We feel that it is irresponsible to introduce the large number of people a casino/resort would bring, to the danger of an emergency evacuation situation. The additional population would also bring added road congestion, endangering surrounding local residents as well.

The casino/resort project would destroy the quality of life of our beloved neighborhood and we are very angry that the project ~~seems~~ seems like it is being forced upon us! It doesn't seem right that an out of county tribe is partnering with a midwestern tribe to just profit monetarily at our and our land's expense.

We ask The Bureau of Indian Affairs to reject The Shiloh Casino project.

Michelle Blake Ronald Blake

**From:** Jim Wright <jwright621@icloud.com>

**Sent:** Wednesday, August 7, 2024 8:59 PM

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

**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

>> Hello Chad, I am strongly opposed to this project, and would only support Alternative D - No Action Alternative. Please see my below comments on areas that were not addressed in the Draft Environmental Impact Statement primarily based on the impacts of Alternative A - Proposed Project.

>>

>> Disingenuous Stated Purpose

>> The "stated purpose" of proposed action is to facilitate tribal self sufficiency, self determination, and economic development. Considering the size of the tribe is 89 members, 52% who live in Sonoma County, a \$600M casino with estimated \$575M annual revenue is way overkill for the stated purpose. This leads one to believe the stated purpose is disingenuous, and the proposed action is really to create a money-making machine for the few casino senior executives and investment partners, primarily the Chickasaw Nation, with I suspect a small percentage trickling to the tribal members, although probably enough to make them all very wealthy. By comparison, the Graton Resort & Casino, of comparable size to the proposed, has 1,400 members of the Federated Indians of Graton Rancheria. A project should be more appropriately sized for the number of tribal members.

>>

>> Employee Challenges

>> The proposed resort and casino is estimated to employ 1,571 full time employees. The average annual salary according to Salary.com of the Graton Resort & Casino is \$39,520 - \$52,000. It's reasonable to assume the proposed resort and casino would pay similar wages. According to the California Department of Housing and Community Development, the median income for a single person living in Sonoma County is \$89,650. <\$70,000 is low income. <\$44,050 is very low income. It's expensive to live in Sonoma County. A recent article in the Press Democrat, the local newspaper, stated according to GOBanking website, a family needs \$144,090 to live comfortably if paying a mortgage, and \$84,823 if paying rent in Sonoma County. The predominantly low and very low incomes to be paid by the proposed resort and casino would not provide a comfortable living for their employees, we don't need more of that in our community.

>>

>> The State of California Employment Development Department indicated a 4.0% unemployment rate as of June 2024 for Sonoma County. This is expected to increase slightly in the next 5 years when the proposed resort and casino would be hiring employees. A Sonoma County Economic Development Board 2023 Workforce Development Survey of local businesses indicated 63% of respondents experienced hiring difficulties, with insufficient number of applications, lack of skills, and reluctance to accept offered wage as primary reasons. The need and lack of employees is evidenced by "Now Hiring" signs posted in many businesses in the local area. Employees will be hard to find for the proposed resort and casino, and 1,571 is

a lot of employees.

>>

>> Groundwater Depletion

>> The proposed resort and casino is estimated to use 170,000 gallons of fresh water per day, or 62,050,000 per year, or 191 acre feet per year, or enough to support 573 single family households. The testing performed so far has not determined conclusively this huge amount of water usage wouldn't significantly impact the groundwater and wells in the area. The EIS proposes to begin a groundwater monitoring program at least 1 year prior to opening, meaning the project would already have been under construction for 1 year considering a 2 year construction timeline. Additional time would be needed to evaluate results from the monitoring. This is too late to make changes should the groundwater be negatively impacted and should be determined prior to project approval.

>>

>> Declining Property Values

>> The EA also states the proposed resort and casino would not significantly impact nearby home property values based on a study of other completed casinos and the property values in a 5 mile radius. It is not realistic to think homes directly adjacent to a \$600M resort and casino operating 24/7 would not be impacted with significantly reduced property values. Who would want to live next to or near such an operation? Housing several miles away would not be as impacted, but that would not be the case for those adjacent to the property who currently enjoy vineyard views.

>

>> Environmental Setting

>> The current project site includes 59.3 acres of landscaping, consisting primarily of vineyards and ornamental trees and plants. The site is located approximately 1/2 mile from Shiloh Ranch Regional Park, an 850 acre park with nearly 8 miles of hiking trails with beautiful views of the surrounding areas, including the project site. The park is enjoyed by numerous Sonoma County residents, including myself, as a way to escape the sounds and sights of the city. The visual simulations of Alternative A in the Draft EIS are hugely inaccurate and in no way reflect what a five-story hotel, four-story parking garage, and three-story casino would look like. The proposed project, a 24/7 mammoth resort and casino operation in such close proximity, would completely shatter the ambience of the park, and make it an undesirable hiking and nature enjoyment location. This is not fair to the park patrons and community.

>>

>> Sincerely, Jim Wright, 713 Willowood Way, Windsor, CA 95492 [jwright621@icloud.com](mailto:jwright621@icloud.com)

>>

Sent from my iPad

Jan MacInnis  
9196 Montego Ct  
Windsor Ca 95492  
707 321-0707

I122

PACIFIC REGIONAL OFFICE

2024 AUG 15 AM 11:19

BUREAU OF INDIAN AFFAIRS

Amy Dulschkgig

Regional director Bureau of Indian Affairs

My name is Jan MacInnis and I live in fairly close proximity to the proposed Koi casino in Windsor Ca. I waited for 2 hrs to speak at the forum but couldn't wait any longer so I'm putting my concerns in a letter.

U heard many carpenters tell their story but this casino effects the surrounding neighborhoods more than it does the carpenters!! Many many more people with a huge impact on their lives and their children's lives But more than that their is a big question of NEED!! If I wanted to gamble I could drive 10 minutes south and gamble in another huge casino in Rohnert Park they have over 3000 slots and 120 gaming tables If that didn't suit me I could go 15-20 min north and gamble in the River Rick or Twin Pines casinos. There are more. They have together over 9000 slots and many hundreds of gaming tables. where is the NEED . we don't NEED our families so closely exposed to this addictive behavior. We don't NEED our spouses spending money we don't have gambling what we do have away. We don't NEED an outside group of developers tearing out our beautiful grape vineyards. We don't NEED this so close in to our community We certainly don't NEED the crime it will bring!! This is a small town area and we really want to keep it as close to that for as long as we can so our kids can grow up where we moved for this type of life. Even the local Indian Tribes say they are breaking their own laws. Holy cow folks we don't NEED or WANT you here. Please take this casino back to Colorado where I think this tribe is from. It's truly a question of NEED. I heard that there was one of these casinos struggling to make it. No wonder because there are too many of them. This is not a big populated area and we don't have the population to support another casino. Please reconsider. Thank you

Jan MacInnis

Windsor Ca

EIS Comments, Koi Nation Shiloh Resort and Casino

8/15/2024

PACIFIC REGIONAL OFFICE  
2024 AUG 19 PM 4:04  
BUREAU OF INDIAN AFFAIRS

To: Amy Dutschke

Please listen to some old folks who live right down the street ( one-half mile) from the proposed resort and casino. We live in a senior (folks over 55 years old) mobile home park, built in the 60's. The address of the park (Colonial Mobile Home Park) is 5645 Old Redwood Hwy. The park office is 66 Colonial Park Dr. The owners, who are now in their 90's still live here. It is a quiet, relaxing, friendly community. There are 192 mobile homes and 300 residents. I have lived here since 2001.

I watched the zoom meeting with Chad Broussard on July 30th, 2024. I learned a lot and it was very interesting. I was wondering how it would change my life.

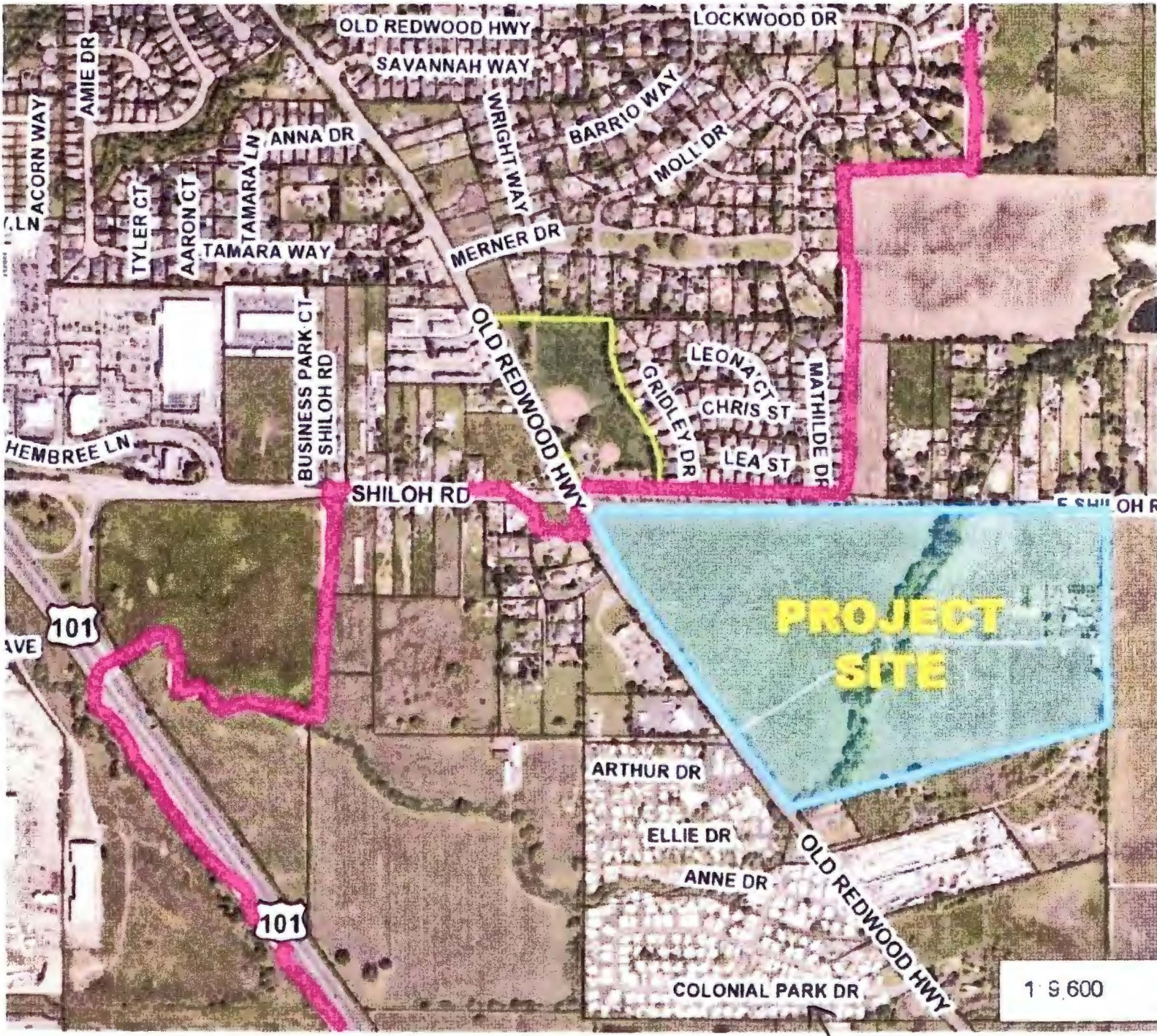
The next day, on the NextDoor Neighborhood Website, I was sickened by the comments made by Pam Miller, a Rohnert Park resident-

"I live near the Graton Casino. Here is what will happen to your neighborhood: Yes, there will be more traffic. Lots of it. Buses. Tons of buses all day, all night. The vermin will arrive from all over the Bay area to get lucky at the slots, and when they don't, they start hitting the mailboxes, cruising through neighborhoods, and crashing through your fences. You will start finding drug paraphernalia and used condoms in certain areas. Most likely the Home Depot parking lot as well. There will be prostitutes at the shopping centers and elsewhere. The drunk drivers will be taking out your fences, parts of your homes, power poles, etc. You will see nothing about this in the local paper. With any luck, Windsor will negotiate an MOU with the tribe and get a few bucks a year for some asphalt or a new police vehicle. It will be pretty crazy for the first few years, but some of it will calm down. You need to prepare: get locking mailboxes, security cameras, and whatever else makes you feel safe. Talk to your neighbors and look out for each other-even if you don't really get along. They're your neighbors and that means something. Good Luck to you all."

The property to our North is also a senior mobile home park. They have 136 homes. We oldsters are used to driving on our two- lane road with little traffic, except for the farm equipment heading to the local vineyard, little noise, except for the roosters early in the morning. We made it out safely during the Tubbs and Kincadee fires. We were without gas for 10 days. We did fine with hot water from our crock pots for cooking or bathing. The great team from Alameda County came to our rescue and reignited our gas.

We're old and tough, but I think that if the comments from Pam Miller are what is to come for us, we will not be enjoying our retirement and final days.

Sincerely,  
Carol Seiler  
88 Colonial Park Dr  
Santa Rosa, CA



**PROJECT  
SITE**

1:9,600

ME

Dear Regional Director, Amy Dutschke,

PACIFIC REGIONAL OFFICE

2024 AUG 16 PM 12:02

BUREAU OF INDIAN AFFAIRS

My name is Michael Dunlap, and I am a member of the Federated Indians of Graton Rancheria. It was brought to my attention that there is a slight feud going ~~on~~ about who has the right to use a specific section of land that my tribe says belongs to us. I am sure that the Koi Pomo Nation feels exactly the same. I would like to suggest a possible solution:

We should take 12 months to perform more historical research on the matter. If the land does belong to FIGR then they should be given 12 months to do something with the land. If they don't, then it should become available to the Koi Pomo Nation.

Hope you have a great day! Sincerely, FIGR Member,  
Michael J. Dunlap

August 17<sup>th</sup>, 2024

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820 Sacramento, CA 95825

PACIFIC REGIONAL OFFICE

2024 AUG 22 PM 3: 56

BUREAU OF INDIAN AFFAIRS

**Subject: EIS Comments, KOI Nation Shiloh Resort and Casino**

Dear Director Dutschke,

In ceremony and prayer this morning, I asked deeply for a way I might clearly beseech you, the Bureau, the KOI and their support team, *to abandon each of the three plans* to develop the unincorporated land adjacent to the Town Of Windsor. It is currently an immense vineyard (and vital wildfire breaker) situated in a wildish area of Sonoma Count. It's surrounded by homes, a neighborhood and Shiloh Regional Park. I live across the road, due west, in a modest mobile home park. The richness of my life, and value of my home, is intimately connected to the natural wildish environs. The natural terrain, a second Regional Park nearby, and a measure of tranquility is found here (even as more traffic and noise creep in, daily.)

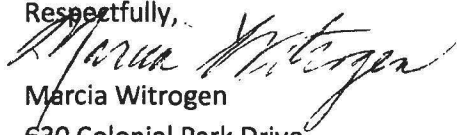
***A hotel and casino gaming complex has no place here.*** You will receive letters from many who live in the area, stating **many reasons why** such an endeavor would be a devastation to life here: humans, non-human kin. Aside from the dangerous threats to wildfire evacuation, and traffic congestion interrupting every conceivable aspect of daily life —there would be the harm to and displacement of our four-legged and winged brothers and sisters. O mitakuye oyasin.

Let the hearts of my Native kin be fully opened. **May those of us who carry in our DNA the Memory of caring for our Mother Earth, of being Her stewards -- prevail.** This land is not meant to carry the weight and unceasing activity of casino and hotel enterprises. All we living beings dwelling in its midst would suffer from the unnatural use of the property, noise, pollution of the environs, water consumption. Devastation has heavy consequences, difficult karma.

Let the Spirit of the KOI and their Oklahoma backers, and those in seek of employment pray: **KNOW** that there **IS** a place that is **PERFECT** to suit your varied needs, that will profit your endeavors, make the land and your kindreds proud for generations to come. But first, this project must be released to Spirit.

This Windsor project is **NOT** that home.

Respectfully,

  
Marcia Witrogen  
630 Colonial Park Drive,  
Santa Rosa CA 95403

"It does not require many words to speak the truth." -Chief Joseph

"Whatever he does to the web, he does to himself... Only when the last tree has died and the last river has been poisoned and the last fish has been caught will we realize that we cannot eat money...whatever happens to the beasts also happens to the man." -Chief Seattle

**From:** Tisha Zolnowsky <Tisha.Zolnowsky@kp.org>  
**Sent:** Thursday, August 8, 2024 8:33 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino- BIA

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

I am writing to provide comments on the proposed **Koi Nation Shiloh Resort and Casino** Project. **I can't believe this is even an option. Really, why is putting a GIANT casino in a neighborhood even an option! 50' from backyards where families, animals, and children play.**

Allowing tribes from anywhere to purchase land anywhere is NOT OK. Putting up giant casinos in neighborhoods is not OK.

That vineyard saved the surrounding neighborhoods by being a fire break. What about the flooding. What happens to the homes 50' away from a parking lot? Where will the water go?

I cannot comprehend how anyone would think that adding a massive casino in a neighborhood is OK. Why are we even talking about this, it's absurd for so many reasons. **Why do us citizens continue to get pushed around by organizations that put their profit before population safety.** Sadly, politics and things like this are driven and bought by money. The little guy (residents) never seem to win against billionaires.

If this project goes through, will we look back and wonder how we got into a situation where the tiny town of Windsor burned up because the people were trapped by traffic? **Who will be blamed** for all the **deaths by fire** and because of the inability to evacuate? The last evacuation took me four hours to leave Windsor, CA. Windsor, CA, is the wrong location for a business that will add more traffic and people than the 26,000 residents. I am on the county line and it took 4 hours!

Seriously, I'm scared.

Yes, a massive project like the proposed casino will destroy the beauty and increase traffic, congestion, and crime in a residential area, but most of all, it will more than double the people in an area that is already challenged with the ability to evacuate in a safe, timely manner. No roads will be big enough.

There are areas in Sonoma County more appropriate for a high volume 24/7 business. This project will needlessly destroy and corrupt a family residential neighborhood to benefit a small number of individuals from another California region.

So sad 🙄

Tisha Zolnowsky

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**From:** Harold <haroldminkin6@gmail.com>  
**Sent:** Thursday, August 8, 2024 12:06 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Cc:** Harold Minkin <haroldminkin6@gmail.com>  
**Subject:** [EXTERNAL] Response to DEIS report

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

Hello Chad,

Attached are my comments regarding the proposed Koi Nation Casino.

*Regards,*

*Harold*

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

August 8, 2024

Ms. Deb Haaland  
United States Secretary of the Interior  
1600 Pennsylvania Avenue N.W.  
Washington, D.C. 20500

Dear Ms Haaland,

Regarding: **“DEIS Comments, Shiloh Resort and Casino Project”**

I am writing to you as I am a citizen of Windsor, California. I participated on the zoom call on July 30, 2024 at 6 PM. A majority of the people who were on the call were against having a casino built at the proposed location. Both Town Council of Windsor and Santa Rosa are against having a casino built

Here are the many issues brought up:

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

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

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

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

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

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

During the proposed construction phase lasting from 2023 until the opening date of 2028, the large construction trucks and workers building from 7 am until 5 pm will create a lot of noise, traffic congestion and increase smog in the area.

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

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

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

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

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

Another item mentioned in the report is that the casino would be located in a "high fire zone". I did not find where the Koi Nation would be building a fire station nearby. Other major concerns are how to get all the people safely evacuated. Regarding emergencies it is stated you will **ONLY** have three employees trained as a firefighter and EMT. ***This will NOT be enough workers to assist in case of an emergency***

Both the council members of Sonoma County, including Santa Rosa and Windsor are opposed to having this casino built. The Graton and Dry Creek Pomo tribes have also stated they are against the casino. Many callers from union construction companies that were told they would be hired by the Koi Nation were the very few in favor of the casino.

***I am hoping the Koi Nation decides to do 3.13.3.5 Alternative D: No Action Alternative***

Regards,  
Harold Minkin

CC: Amy Dutschke, Pacific Regional Director  
Chad Broussard, Environmental Protection Specialist, Deb Haaland, Secretary of the Interior

August 19, 2024

PACIFIC REGIONAL OFFICE  
2024 AUG 22 PM 3: 59  
BUREAU OF INDIAN AFFAIRS

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

Subject: EIS Comments, Koi Nation

Dear Regional Director Dutschke,

I am writing to express my **STRONG** opposition to the Koi Nation's proposed project to establish trust land in Windsor, California. I have been a Sonoma County resident since birth, 62 years, and my family has been here for generations. I am also an enrolled member of the Cloverdale Rancheria Pomo Indians of California.

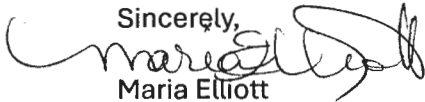
The Koi Nation's historical and cultural connections are in Lake County, they are even currently suing the County to regain their historical sites. Their customs, language, and traditions are distinct from those of the Southern Pomo tribes. The Koi Nation's claims that their historic connections are based on trading interactions are crazy. Trading goods with another tribe does not grant territorial rights. Such interactions were common among tribes but did not imply ownership or rights to the land. Imagine China claiming America is their country because we trade goods with them, would that be allowed?

The Koi Nation has every right to assert their legal rights as an indigenous tribe BUT within their own territory in Lake County. The Sonoma County Tribes have protected and preserved these lands for countless generations. The Bureau of Indian Affairs (BIA) should consider the fact that this is KOI's 3<sup>rd</sup> attempt to go outside of their historical area, does this not prove they are "reservation shopping" for the best location to make their 90+ members billionaires? What about the true Sonoma County tribes that are indigenous to this area?

This project would have significant effects on the sovereignty of my Tribe and our cultural resources. I urge the BIA to consider alternative project sites for the Koi Nation that do not infringe upon the cultural sovereign lands of other tribes. Protecting tribal sovereignty and cultural resources is not just a legal obligation but a moral one.

Thank you for your attention.

Sincerely,

  
Maria Elliott  
8567 Planetree Drive  
Windsor, CA 95492

**From:** Rochell Letasi <cletasi@comcast.net>  
**Sent:** Thursday, August 8, 2024 1:20 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Cc:** cletasi@comcast.net <cletasi@comcast.net>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

Dear Dr. Broussard,

I am writing in hopes of sharing I concern over the Environment Impact Statement that was shared with the community of Windsor, CA. I am not a Nor Cal Carpenter Union member nor am I a Native American. I am, however a citizen of the Town Of Windsor who moved here 29 years ago to raise my family. My husband and I were drawn to this are because of the small town charm and caring community.

The EIS presented to the community is lengthy and some part difficult to understand. What I did come away with is the report has not shown the true impact this project will have on not only the community of Windsor but all of Sonoma County. We are already struggling with water shortages and with the current housing/apartment projects already in the works for Windsor it makes this even more of a concern. We are in a fire prone area and have already experienced very congested roadways during evacuations. Have you recently experienced driving in the area of Old Redwood Hwy and Shiloh recently? It's busy and once they finish the projects on Shiloh Rd and Old Redwood Hwy it will be even more so. I don't feel that the EIS covered this toughly. Nor do I feel that it adequately takes in to consideration law enforcement and the safety of our community. I have grandchildren that attend San Miguel School which is less than a mile for this project. People will end up driving down Faught Rd to get to or leave the purposed project.

What about the housing for the employees this project would have to hire? We already have a housing shortage though out Sonoma County!

I do sympathize with the Koi Nation and their quest for useable land. I feel that since they are from Lake County they should seek land in their own homeland as their ancestors have done before them. I understand that they are a tribe of about 90 people and need the assistance of the Chickasaw Nation of Oklahoma in order to bring the this project to completion. Since they have the aid of a well-known tribe they should be able to find and purchase land in their own community, Lake County.

A project such as the Koi Nation Shilo Resort and Casino would have a devastating impact for this community and Sonoma County for so many reasons. If the Koi Nation and the Bureau of Indian Affairs care about the environment and this community, the lives of the people who live and work here then then it would not build this project.

Best regards,  
Rochell Letasi



Sidnee Cox • 5846 Leona Court, Windsor, CA 95492

August 20, 2024

Chad Broussard  
Environmental Protection Specialist  
Bureau of Indian Affairs, Pacific Region  
[chad.broussard@bia.gov](mailto:chad.broussard@bia.gov)

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820, Sacramento, CA 95825

Re: EIS Comments, Koi Nation Shiloh Resort and Casino Project

Dear Mr. Broussard and Ms. Dutschke,

Thank you for this opportunity to submit public comment regarding the Environmental Impact Statement for the proposed Koi Nation Shiloh Resort and Casino Project. I've read the 278 pages of the EIS, as well as most of the supplemental attachments. I oppose this project for the reasons discussed below.

I understand that in 2019, the Koi Nation became a federally recognized tribe, and in 2021 they purchased the 68 acre vineyard adjacent to Windsor, CA. The Koi Nation intends to establish this site as their sovereign land.

The problem? They don't plan on living there according to the EIS. They plan on building a massive casino complex that will bring thousands of daily visitors, gamblers, vacationers, partiers, and concertgoers, (requiring over a thousand employees), to an agricultural property that contains a vineyard with seasonal waterway (Pruitt Creek, a tributary to the Russian River). The site is also next to neighborhoods with many homes, and in close proximity to apartments with families and kids. A county regional park (Shiloh, Regional Park) frequented by hikers, cyclists, and equestrians, and a family friendly park (Esposti Park) with two baseball fields for Little Leaguers and sports teams are right across the street. On an average weekend, the Esposti parking lot can be full.

We understand the Koi Tribe lost their homeland in Clear Lake generations ago and many tribe members have been residing in other areas such as Sebastopol and Santa Rosa. They want a place to call home. Of course that is understandable.

But a home is NOT a 68 acre casino complex that consists of a 400 (or 200) room hotel, multiple restaurants, gaming facilities, spa, entertainment theater, parking garage for thousands of cars, with a waste water treatment plant, etc.. The Koi resort project will be a cooperative business venture with the Chickasaw from Oklahoma.

This planned resort, which is supposed to reclaim a sovereign place for the Koi to call home, is not only going to cause profound harm to the land and environment, it will also put the surrounding roadways, neighborhoods and recreational parks at risk. The EIS is required to delve deeply into these risks and determine the extent of the harm and explore possible mitigation strategies. Reading through this extensive report, it is obvious that there are too many sources of harm to be mitigated. ("Best Management Practices" are not mitigation and will not render the impacts "less than significant.")

This proposed Koi project will significantly impact air quality, water resources (i.e. well water depletion), crime rates, Pruitt Creek contamination, traffic circulation, fire evacuation, public services, and cause noise and light pollution. No amount of mitigation will change these facts.

A massive casino complex must not be erected on this site (identified as Alternative A and B). Neither should Alternative C - "the non-gaming alternative" which consists of a 200 room hotel with 20,000 sq ft. winery, 5,000 sq ft. visitors' center, spa, restaurant, water purification and wastewater treatment facility, and parking lots. And since the Koi will be partnering with the Chickasaw, who own and operate 23 casinos in Oklahoma, including WinStar World Casino and Resort in Thackerville, Oklahoma (perhaps the largest casino in the world), how long will it be before Alternative C is turned into Alternative A or B?

A strong indication that Alternative A or B is the plan of the Chickasaw can be seen in their business model and simply by following the money. For the Koi Nation (a small Pomo band of 90 members) to purchase a 68-acre vineyard in Windsor created some questions at the outset. In January 2022, Koi leaders revealed a pre-development agreement with the Chickasaw Nation whereby Global Gaming Solutions— a wholly owned Chickasaw business— would partner with the Koi to construct a \$600 million dollar casino resort and also manage and operate the facility.

Chickasaw Nation Governor, Bill Anoatubby, commented:

*"The Chickasaw Nation is pleased to play a role in this project, and we look forward to a successful collaboration.... The prosperity of our citizens and a commitment to working together with our partners in the Koi Nation as well as local, state, and community officials are key components to our mission. We look forward to witnessing new jobs, additional businesses, and increased tourism to this region."*

<https://sbcamericas.com/2022/01/25/koi-nation-partners-with-chickasaw-nation-for-planned-shiloh-casino-in-california/>

Additional businesses? Increased tourism? New jobs to the area? What about everything that comes with that? Is this what we want for our town? This project will catapult the Town of Windsor into something unrecognizable and unnecessary, environmentally harmful, and potentially dangerous, especially when we have another evacuation.

This project is opposed by all our Windsor Town Council members, Sonoma County Supervisors James Gore and Lynda Hopkins, State Senator Mike McGuire, U.S. Rep, Jared Huffman, and most recently, Governor Gavin Newsom (see attached letter dated August 18<sup>th</sup>, released from Gov. Newsom's office).

Option D, "No action alternatives" would allow the land to remain in its existing condition and not taken into trust "for the foreseeable future." No environmental effects would occur. Pursuant to the National Environmental Policy Act's 40 CFR section 1502.14[f], Alternative D was determined to be the environmentally preferred alternative.

It is imperative that the Koi procure an alternative site to pursue their business objectives "in order to best meet the tribe's objectives and provide the greatest socioeconomic benefit to the Tribe and the surrounding community." (*quote from EIS Section 2- Comparison to the Alternatives 2.5 p. 2-28*)

I have lived in Windsor since 1987. When our town was incorporated in 1992, a community separator and Urban Growth Boundary was established to provide critical open space directly south of town (now the location of the proposed casino project). This open space proved to be a vital firebreak during the Kincadee fire in 2019 that threatened to destroy most of Windsor. The flames came within a half mile of our neighborhood on East Shiloh.

It is my prayer and fervent intention that objective logic and clear vision will prevail, and the BIA will not allow this land to be taken into trust for these project alternatives.

The neighbors of southeast Windsor are exercising our rights as property owners, voters, taxpayers, and stewards of our land. We remain firmly dedicated to opposing this development so we may continue to enjoy a safe and peaceful environment for our families, our community, and our longtime neighbors.

We support the Federated Indians of Graton Rancheria and the Dry Creek Rancheria of Pomo Indians that own and operate the Graton Casino and River Rock Casino, respectively, in Sonoma County.

Some final questions:

- What federal, state or local protections will the environment have if this land is taken into trust?
- Who would monitor the environmental impact on an ongoing basis?
- What steps can be taken by any jurisdiction if environmental requirements are not followed?
- What sort of legal precedent will be set if the Chickasaw Nation is allowed to get a foothold into the gaming industry in Sonoma County and California?

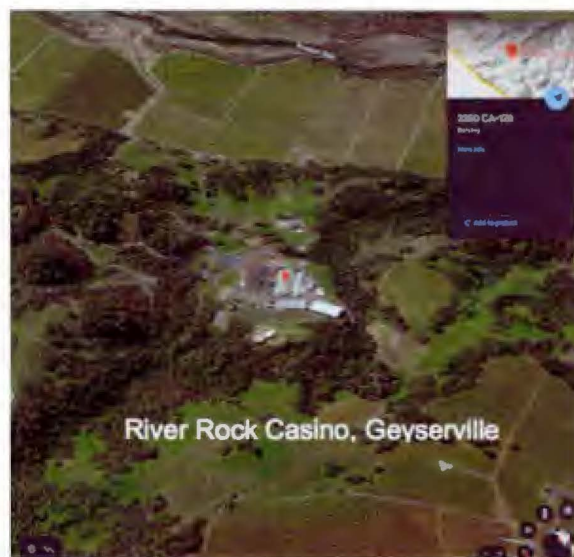
Thank you for your time on this critical matter.

Sincerely,



Sidnee Cox

Comparisons between Graton Resort and Casino in Rohnert Park (currently being expanded), River Rock Casino (expansion plans in the works), and the proposed Koi Shiloh Resort and Casino adjacent to Windsor.



Above left, Graton Casino, Rohnert Park, is in an industrial and business zone. Above, River Rock Casino, Geyserville, is in an agricultural/rural area, not near any housing developments.

Below, left, the proposed Koi Casino will be located at Windsor's southern boundary. It will be adjacent to residential neighborhoods. The two new apartment complexes impacting evacuation routes are shown in orange.

The proposed Koi project alternatives A, B and C will have significant environmental impact on water resources, traffic, air quality, public services, evacuation planning in emergencies and more. The most recent EIS does not reduce these impacts to "less than significant."



## OFFICE OF THE GOVERNOR

August 16, 2024

Bryan Newland  
Assistant Secretary – Indian Affairs  
U.S. Department of the Interior  
1849 C Street, N.W., MS-4660-MIB  
Washington, D.C. 20240

Re: Shiloh Resort and Casino Project (Koi Nation of Northern California)  
Scotts Valley Casino and Tribal Housing Project (Scotts Valley Band of  
Pomo Indians)

Dear Assistant Secretary Newland:

On behalf of Governor Gavin Newsom, I write to urge the U.S. Department of the Interior not to move forward with the Shiloh Resort and Casino Project in Sonoma County and the Scotts Valley Casino and Tribal Housing Project in Solano County.

Governor Newsom and his Administration are grateful for the opportunity to share our perspective on these projects, as we are grateful to the Department for its thoughtful and constructive engagement in a wide range of other contexts. Our concerns about these specific projects, and their specific procedural pathway, should not be understood as a criticism of the Department's broader practice of taking land into trust for tribal governments—including, in appropriate cases, the Department's practice of (and time-tested procedures for) taking land into trust for gaming. The Governor recognizes the important role that this practice can play in supporting tribes' political sovereignty and economic self-sufficiency.

At the same time, however, caution is warranted when considering the potential expansion of gaming to land that is not currently eligible for gaming. This is particularly true in California, where the voters who legalized tribal gaming

were promised that such gaming would remain geographically limited. This historical context underscores the importance of striking a careful balance between the potential benefits of expanded tribal gaming and its potential impacts on surrounding communities.

Federal law contains important safeguards that have previously helped the Department strike this delicate balance. As a starting point, federal law generally prohibits gaming on new land taken into trust for a tribe, unless the land is linked to the tribe's preexisting reservation. 25 U.S.C. § 2719(a). The principal exception to this rule carefully safeguards local interests (including the interests of local tribes), allowing gaming only where the Department has determined not only that such gaming would be in the best interest of the gaming tribe, but also that it "would not be detrimental to the surrounding community"—and only where the relevant state's governor concurs in that determination. 25 U.S.C. § 2719(b)(1)(A). Governor Newsom discharges this responsibility with the utmost care, and has previously exercised this power in a manner that supports both tribal self-sufficiency and the interests of surrounding communities. See, e.g., Letter from Governor Gavin Newsom to Bryan Newland, Assistant Secretary – Indian Affairs (June 13, 2022). The Governor appreciates the opportunity to engage in this important process, which appropriately balances the sovereign interests of states and tribes.

Here, however, the Governor is concerned that the Department might depart from this familiar procedure and its important safeguards. In their current form, these two projects propose to rely on a different statutory provision that allows gaming on land taken into trust—without a two-part determination or the Governor's concurrence—as part of "the restoration of lands for an Indian tribe that is restored to Federal recognition." 25 U.S.C. § 2719(b)(1)(B)(iii). Make no mistake: the Governor recognizes the profound moral value of restoring a tribe's control over its aboriginal homeland. Care must be taken, however, to ensure that this "restored lands" exception—like all exceptions—remains within appropriate limits. The "restored lands" exception must not be construed so broadly as to "give restored tribes an open-ended license to game on newly acquired lands." *Redding Rancheria v. Jewell*, 776 F.3d 706, 711 (9th Cir. 2015). On the contrary: "In administering the restored lands exception, the Secretary needs to ensure that tribes do not take advantage of the exception to expand gaming operations unduly and to the detriment of other tribes' gaming operations." *Id.*



As explained below, neither of these two proposed projects fits within the limits of the “restored lands” exception.

As to the Shiloh Resort and Casino Project, the Koi Nation of Northern California lacks sufficient historical connection to the Windsor parcel to support the “restored lands” exception. The Windsor parcel does not fall within the Koi Nation’s aboriginal homeland: it lies approximately fifty miles, over winding mountain roads, from the Lake County region where (as the Koi Nation acknowledges) “the Koi Nation’s ancestors had villages and sacred sites along the shores of Clearlake since time immemorial.” Koi Nation’s Opening Brief at 11, *Koi Nation of Northern California v. City of Clearlake*, No. A169438 (Cal. Ct. App. Apr. 30, 2024). The assertion that the Koi Nation sometimes used trade routes or otherwise obtained resources near modern-day Windsor cannot change this basic fact: such transient uses do not show the kind of sustained, durable presence that would be necessary to support the view that the proposed project represents a “restoration.” Nor can it matter that individual members of the Koi Nation voluntarily resided in Sonoma County during the twentieth century. If the presence of individual members in modern times were conflated with a tribe’s control over its aboriginal homeland, for purposes of the “restored lands” exception, the exception could swallow the rule—which, as the Ninth Circuit has warned, it must not do. See *Redding Rancheria*, 776 F.3d at 711.

The Scotts Valley Casino and Tribal Housing Project raises similar concerns. Like the Koi Nation, the Scotts Valley Band has its aboriginal homeland in modern-day Lake County. Like the Koi Nation, the Scotts Valley Band lacks the deep and enduring connection to the relevant territory (here, the Vallejo parcel) necessary to invoke the “restored lands” exception. And here again, the nearby presence of specific individuals, late in history, must not be conflated with the Tribe’s collective control over its aboriginal homeland. Nor can an 1851 treaty—apparently purporting to cede a vast swath of the North Bay, Sacramento Valley, and Clear Lake regions—produce a different result. Cf. *Scotts Valley Band of Pomo Indians v. Dep’t of the Interior*, 633 F. Supp. 3d 132, 168 (D.D.C. 2022). Nineteenth-century treaties were hardly models of respect for tribal sovereignty, and one cannot safely assume that they accurately reflect the boundaries of tribes’ aboriginal homelands.



The Department's interpretation of the "restored lands" exception further counsels against applying that exception to the Scotts Valley project. The Department has construed the "restored lands" exception to require one or more "modern connections" between the tribe and the land. 25 C.F.R. § 292.12(a). In the context of the Scotts Valley project, no such modern connection is apparent. On the contrary, the Environmental Assessment appears to recognize that the Scotts Valley Band has no presence in Solano County: the Environmental Assessment notes that the Band's members "span[] across Alameda, Contra Costa, Lake, Mendocino, and Sonoma Counties," while omitting any reference to Solano. Env'tl. Assessment at 1-2. Under the Department's view of the "restored lands" exception, embodied in its regulations, this lack of "modern connections" provides an additional reason not to use the exception to proceed with the Scotts Valley project.

Nor can the so-called "Indian canon" stretch the limits of the "restored lands" exception to encompass these two projects. *Cf. Scotts Valley Band*, 633 F. Supp. 3d at 166–68. Although that canon sometimes allows statutory ambiguity to be resolved in favor of tribal sovereignty, it has no application where—as here—"all tribal interests are not aligned." *Redding Rancheria*, 776 F.3d at 713. "An interpretation of the restored lands exception that would benefit [a] particular tribe, by allowing unlimited use of restored land for gaming purposes, would not necessarily benefit other tribes also engaged in gaming." *Id.* Here, other local tribes—tribes who truly have called the relevant lands home since time immemorial—are steadfast in their opposition to these projects. "The canon should not apply in such circumstances." *Id.*

Finally, misplaced reliance on the "restored lands" exception, in the context of these two projects, also risks leading the Department astray under the National Environmental Policy Act. As explained above, the Windsor parcel and the Vallejo parcel fall far outside the aboriginal homelands of the Koi Nation and the Scotts Valley Band, respectively. In focusing on those two parcels, the Department has thus far failed to consider whether the purposes of the proposed projects could be served by sites within the Tribes' aboriginal homelands—which is to say that the Department has, thus far, failed to adequately consider reasonable geographic alternatives as required by NEPA. See *'Ilio'ulaokalani Coal. v. Rumsfeld*, 464 F.3d 1083, 1097–1101 (9th Cir. 2006).



Governor Newsom has deep respect for tribal sovereignty, and he has been proud to restore tribes' control over lands from which they have been dispossessed. Here, however, he is concerned by the prospect that the Department might invoke the "restored lands" exception to support projects that are focused less on restoring the relevant tribes' aboriginal homelands, and more on creating new gaming operations in desirable markets. If the Department were to embrace this view of the "restored lands" exception, it is far from obvious that the "exception" would retain a clear and durable limiting principle. This prospect is particularly troubling in California, where the voters who approved tribal gaming were promised that such gaming would remain carefully limited—including by federal law and its geographic restrictions on the categories of land open to gaming.

Governor Newsom is committed to working with tribal governments, and the Department, to support tribes' self-determination and economic development. In appropriate cases, the Governor stands ready to exercise his authority, under federal law, to concur in the Department's decision to take land into trust for gaming. Here, however, he is concerned that these specific projects are proceeding in a manner that would sidestep the State, ignore the concerns of tribal governments and other local communities, and stretch the "restored lands" exception beyond its legal limits—while failing to adequately consider whether there might be a better way. On behalf of the Governor, I urge the Department not to move forward with these proposed projects.

Sincerely,

A handwritten signature in black ink that reads "Matthew Lee". The signature is fluid and cursive, with the first name "Matthew" written in a larger, more prominent script than the last name "Lee".

Matthew Lee  
Senior Advisor for Tribal Negotiations &  
Deputy Legal Affairs Secretary  
Office of Governor Gavin Newsom

Cc: Amy Dutschke, Regional Director for the Pacific Region, Bureau of Indian Affairs



**From:** Robert Eberling <roberte@sonic.net>  
**Sent:** Thursday, August 8, 2024 3:14 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Let's stop this Casino Project -NOW-

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

In my last letter of opposition (EIS) to the Koi Nation of Northern California Shiloh Resort and Casino Project; I listed the infamous discontinuous state wide California drought as reason for not approving the current and very controversial 'Shiloh Resort and Casio Project.

I noted that California's intermittent years of paralyzing drought, and Northern California's ( Sonoma County) commitment to the exceptionally large construction of mammoth apartment housing complexes are making water usage and conservation a very important consideration in this matter.

Among the other considerations such as the impact of more traffic in our area and the pollution that comes with this problem; we will also face a potential increase in crime along with higher costs of law enforcement, and most likely, more drinking and driving.

The other day as I looked out at the beautiful vineyards where this casino resort is being planned, I felt a very deep sadness. I can't imagine how the wild life in our area, and its survival will be effected; and also, how much our peace and quiet will be shattered when the construction begins to rip out the vineyard and pour concrete for the parking lots and the large sprawling campus of buildings; a casino, hotel, pools, restaurants and so forth....

Northern California already has it's fair share; a plethora, of Tribal Casinos along with their large consumption of water and destruction of wild life. Please, Let's stop this project. Now!

Sincerely,  
Robert Eberling

**From:** Angela Penland <adpenland@icloud.com>

**Sent:** Thursday, August 8, 2024 3:29 PM

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

**Subject:** [EXTERNAL] EIS COMMENTS - KOI NATION'S SHILOH RESORT AND CASINO IN WINDSOR, CA

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

August 8, 2024

Chad Broussard  
Environmental Protection Specialist  
Bureau of Indian Affairs, Pacific Region

**RE: EIS COMMENTS—KOI NATION'S SHILOH RESORT AND CASINO**

I am a Tribal Citizen of the Federated Indians of Graton Rancheria (FIGR), located within the Wine Country of Sonoma County and I vehemently oppose the Koi Nation (a Lake County Pomo tribe from more than 50 miles away), applying for Fee-to-Trust status to take land from *our* ancestral territory—for the purpose, not only of a reservation far from their original home, but to establish a casino *in my backyard* to directly compete with two tribal casinos already established within a 20-mile radius from me.

I was born and raised here in the heart of Wine Country—this is a county of limited space, unaffordable housing, prime agricultural land and rampant wine tourism. It's a place I've witnessed change beyond recognition from the humble farming community I roamed on horseback as a child. There is no room here for reservation shopping and unlimited casinos. This project is proposed on an intersection between single family homes and open vineyards in the small, congested Town of Windsor. I cannot think of a more inappropriate place to build any kind of large commercial project, even by a tribe that actually belongs here.

Setting a precedent that is opposite to a long standing tribal and federal government tradition is a dangerous affair, with repercussions for both sides. This is an attempt to erode tribal sovereignty—historically not a new concept. However, this tribe nor the ones funding or supporting them seem to realize the consequences of losing our status as sovereign nations. No, money and greed is the motivator here—not the history nor honor of our ancestors. Allowing tribes to take land into trust for casinos wherever their members traveled for work or trade means that our own tribe could establish a casino in San Francisco. Is that what the BIA really wants? Tribes across wide geographical areas traded regularly with each other and socialized/married outside of their immediate point of origin, but that does not mean that was their home—the same way traveling to France does not automatically make you a citizen. My own grandparents met traveling on the road picking hops and prunes; sometimes living in different areas for extended periods for work—but they knew where Home was. This action would also infringe on the cultural, historical, and territorial rights of other tribes in Sonoma County such as the Dry Creek, Lytton, and Cloverdale Rancherias and drastically impact any future economic projects they should pursue.

The DOI is obligated to uphold the existing laws established by the long tribal and federal government relations. The Koi Nation must also follow these laws and seek a reservation in their own ancestral territory, in their true and original homeland of Lake County. This is something we were required to do as well. It should be no different for any other tribe.

Respectfully,

Angela D. Penland, FIGR Tribal Citizen  
PO Box 131  
Windsor, CA 95492  
707-670-0333

## EIS Comments, Koi Nation Shiloh Resort and Casino

Recently driving home from Santa Rosa to Windsor on Old Redwood Highway, my husband and I encountered a line of traffic stopped dead all the way from where Old Redwood Highway meets Mendocino Ave to north past Mattie Washburn school on Pleasant Ave in Windsor.

What is going to happen when they put a casino at the corner of Old Redwood Highway and Shiloh Ave? Not to mention when the apartment complex across the street is finished and occupied. These narrow 2 lane roads can not handle a huge influx of traffic.

What happens in an emergency when all of Windsor and unincorporated North Santa Rosa is trying to evacuate?

What happens in the next drought year when we are under water conservation restrictions.

It seems that in the rush for some individuals to make money the health, safety and peace for families of the town of Windsor has been totally ignored.

Candace Spring  
6500 Harmon Lane  
Windsor CA  
95492  
707-953-8611

A PULITZER PRIZE-WINNING NEWSPAPER

# The Press Democrat

Santa Rosa, California

Eric Johnston, Chief Executive Officer

## NEWS

Chris Fusco, Executive Editor  
John D'Anna, Managing Editor

## OPINION

Jim Sweeney, Editorial Director  
Ray Jones, Editorial Board Community Member  
Brenda Speth, Editorial Board Community Member  
Oscar Chávez, Editorial Board Community Member

MIKE SMITH  
LAS VEGAS, SIN 2024

PACIFIC REGIONAL OFFICE

2024 AUG 15 PM 12:00

BUREAU OF PUBLIC AFFAIRS

RE: KOI CASINO RESORT

Please see attached letters to the Press Democrat, which contain important remarks in opposing the Casino Resort project on Shiloh Rd, Santa Rosa, CA.

Thank you for your attention

L. R. Darst



Mrs. Lynn Darst  
5845 Mathilde Dr  
Windsor, CA 95492

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Now the news industry is near collapse. There are fewer than half as many reporters today as 25 years ago even as interest in politics has never been greater. In many places, newspapers simply closed, creating so-called "news deserts."

Without reliable reporting on what's happening at city hall,

the money would come from a fee assessed against the value of personal information that Californians turn over to the companies in exchange for free Gmail or other services. It's a form of payment that isn't taxed though it has tremendous value.

Both bills have passed their chamber of origin and await action in the other. The fact that

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in school board meetings and the state capital, voters lack the knowledge they need to make informed decisions in elections and to be active participants in their government. They turn to agenda-driven outlets that offer a poor simulacrum of news. All the while, trust in government withers.

Assembly Bill 886 would force tech companies to pay a fair share for the news that they profit from. Large digital companies that link to news stories to drive traffic — eyeballs that also look at ads — would

McGuire, a Democrat from Healdsburg, is a co-author on each, might give them a leg up, but powerful business interests are fighting back.

In a perfect world, lawmakers would pass both bills before the legislative session ends this month. That's unlikely because they won't want to hit Big Tech twice, but one or the other of them should be possible. Make California a place where journalism thrives in service of an informed public and a vibrant democracy.

admission prices and also pay for carnival rides? Just like the Harvest Fair — I stopped going because the prices were high for what you were getting.

**KATHY NELSON**  
Rohnert Park

## Opposing casino

**EDITOR:** I live in San Francisco and come to Wikiup/Larkfield on weekends to relax. It's a getaway from the city's noise and frequent sirens. If the Koi casino project goes through, the noise from Highway 101 will be much greater, not to mention sirens at all hours.

Depending on my departure times, the commute can be brutal, and adding 11,213 daily car trips to and from the casino to Highway 101 and Redwood

described having a ray of emotion her strengths currently, as glowing assessments years ago. I feel of mixed feelings column. I would be fair and be a public official to their politics and I believe did so. What that the politics is currently that beggars When Democrats are noted to faux pas the Donald Trump and transgressing mystifying and add to left with co

### CONTACT US

#### LET THE PUBLIC SPEAK:

Email letters of no more than 200 words to [letters@pressdemocrat.com](mailto:letters@pressdemocrat.com). Writer's name, address and phone number must be included. Letters may be edited for length and clarity.

#### STAFF CONTACT:

Editorial Director Jim Sweeney  
Phone: 707-521-5201  
Email: [jim.sweeney@pressdemocrat.com](mailto:jim.sweeney@pressdemocrat.com)

# This enigmatic state may determine

## LAS VEGAS

Nevada, whose flag proclaims it "Battle Born," galloped like Paul Revere into statehood eight days before the 1864 presidential election, its constitution having been sped to Congress by what was then history's most costly telegraph transmission. This was done to provide President Abraham Lincoln with three electoral votes he might need: On Aug. 23, he had written a two-sentence letter saying "it seems exceedingly probable that this Administration will not be reelected." Eleven days later, Gen. William Sherman telegraphed, "Atlanta is ours." Lincoln, and the Union, would prevail.

Forty presidential elections later, Nevada might matter less than its six electoral votes, which Donald Trump has narrowly won twice, than for its Senate vote, which could decide the fate of that chamber. It is one of the swing states (including Wisconsin, Michigan and Pennsylvania) with more competitive Senate contests. Incumbent, Democrat

## GEORGE F. WILL



Jacky Rosen, 67, is seeking a second term. Her Republican opponent is Sam Brown, 40, a retired Army captain severely scarred by third-degree burns over a third of his body, including his face, from an improvised explosive device in Afghanistan. Their race epitomizes the uncertainties created by Joe Biden's withdrawal, and the difficulty of taking Nevada's political temperature.

The pandemic pancaked this state, which depends on people flying in to congregate in casinos and entertainment venues. This is a strange state, and not just because its biggest industry is what locals call "gaming," and what, until relatively recently, most Americans considered sinful. Las Vegas's Clark County contains 70% of Nevadans. More than 80% of the state's land is owned by the U.S. government.

Las Vegas is a 24-hour town,

and voters can be difficult for public opinion pollsters to reach by phone. This is a booming city of transients, with many people moving in and a substantial number moving on. The muscular Culinary Workers Union provides cohesion for 60,000 members and their families. In 2022, half of Nevada voters had registered since 2016; newcomers do not know Rosen well. The Democrats' registration advantage was 6 points in 2016, 4.8 points in 2020 and 1.5 points this summer.

Nevada's other U.S. senator, Democrat Catherine Cortez Masto, won reelection in the closest race of the 2022 cycle by 0.77 points. Rosen, energetic and talented at retail politics, was leading Brown by more than the margin of polling error — at least 4 points — before the Biden albatross was removed. Barack Obama carried Nevada by 12.5 points in 2008, but just 6.7 points in 2012. In 2016, Hillary Clinton won here with just 47.9%; in 2020, Biden won with just over 50%. As a voter-turnout measure, there is a ballot initiative to give state constitution

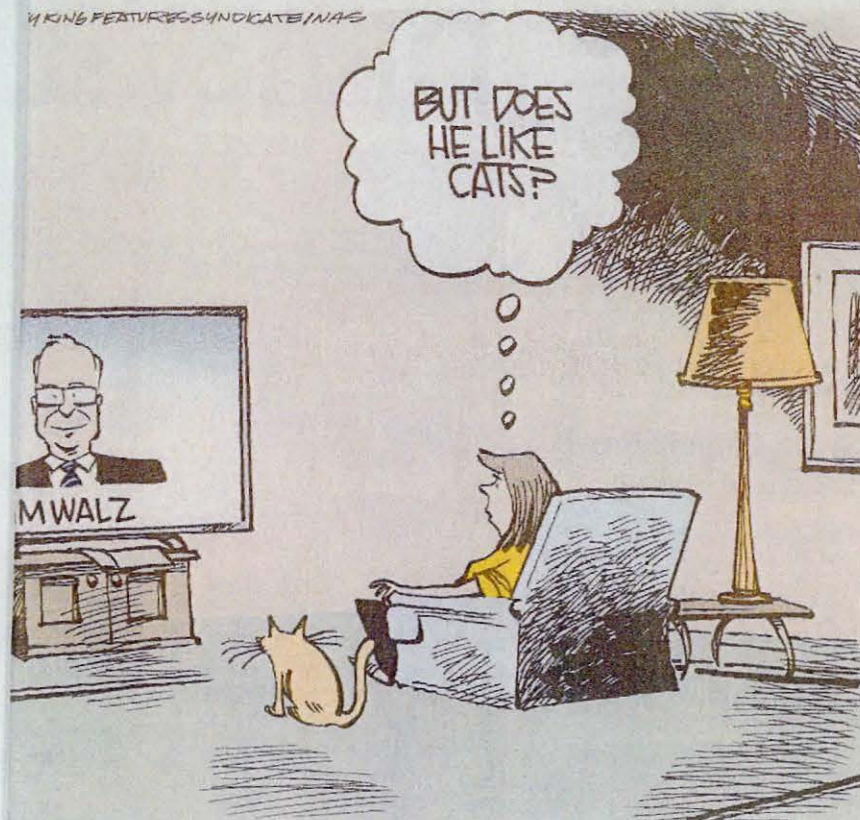
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Trump Nevada p that Nevada state he l win. This Kamala and min

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**SDEMOCRAT.COM/OPINION: NIXON, BIDEN AND TWO**

KING FEATURES SYNDICATE/INARS



## LET THE PUBLIC SPEAK

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Highway will exacerbate it. Beyond traffic, exhaust from cars (which will not be electric until well after 2035) and trucks is grossly undercalculated in the draft environmental impact statement. The traffic gridlock on 101 and all the feeder roads south of Windsor will make evacuation in case of fire extremely dangerous.

I hike in the regional park (a half-mile from the casino), and I looked for the view that is pictured in the draft EIS — it must have been manipulated because the casino would be much closer to the park than in the photo. Wildlife that navigates at night will be confused by the light, and our starry views will be dampened by casino lights.

Do not add a five-story hotel and a casino to our quiet neighborhoods.

**MARY FOLEY**  
San Francisco

### Mixed emotions

EDITOR: I am a fan of David Brooks. He appears to be a compassionate, thoughtful and reasonable man. In his July 29

do not want censorship, but the idea of another Trump term is a horrifying thought, and I fear that the more Harris' faults are put forth, the more likely that is to occur. What to do?

**RICHARD A. DURR**  
Santa Rosa

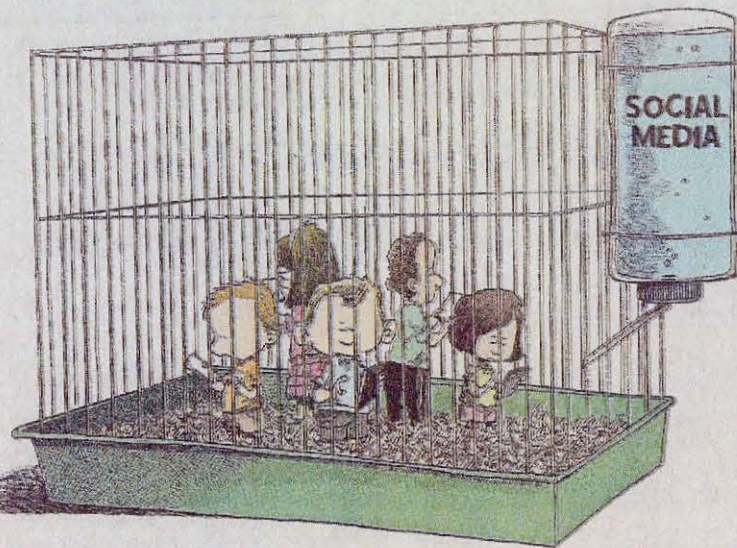
### Buyer's remorse?

EDITOR: Now that the Democratic candidate is a vigorous minority woman, does Donald Trump regret his pick of JD Vance for running mate? Especially when Vance's extreme position on abortion (not even for rape) and insults to women (childless cat ladies) turn many swing voters off. Vance may help in Ohio but hurt in the rest of the country.

**JON YATABE**  
Homer, Alaska

### Olympic inspiration

EDITOR: A letter to the editor criticized the Olympic opening ceremony for having a segment supposedly about the Last Supper ("Olympic sacrilege," Aug. 6). The painting



## LAB RATS

he was let go, but I do know it was not voluntarily. Goelz and his staff have brought great positive recognition to the school and their program. I don't know how many more years he was planning to coach, but if he was in fact unwillingly let go, he deserved much better than that. Coach Goelz has earned the right to leave on his own terms.

I am sure the new coach is a good guy, and knows the business, but I feel the school made a huge mistake letting someone of Goelz's stature and reputation be ushered out in such an uncaring fashion. Our athletic conference lost a great coach, but more importantly, a great person. Thanks for being the model we all strive to be.

**JIM HOLDEN**  
Redlands

Holding the bag? Taxpayers forced to fund infrastructure improvements on Highway 101, Shiloh Road and around our airport. Up to 55,000 daily visitors would visit Shiloh; parking in over 5,000 planned parking spaces, bused in and shuttled in from our airport. Major road expansion would be mandatory and urgent.

Throw in depleting water resources — it would use about 400,000 gallons daily, and a host of other concerns, and there is only one logical conclusion. We cannot afford to host another mega casino. Voice your concerns to the BIA by the Aug. 26 deadline.

**ANNE GRAY**  
Santa Rosa

## Nixon's anniversary

EDITOR: It's hard to believe that it was 50 years ago Friday that the crooked scoundrel Richard Nixon resigned the presidency. He only did that because Republicans of the era like Sen. Howard Baker had an ounce of integrity and understood that Nixon's cover-up of a third-rate burglary was the tip of the iceberg of his dirty tricks and lies, behavior they deemed unacceptable for a president. It's also hard to believe that Nixon was a total cream puff of evil behavior and unethical dealings in comparison to the crooked scoundrel the Republican Party is now completely in lockstep with.

**KEN EGEL**  
Petaluma

## Chickasaw Nation of Sonoma?

EDITOR: Many argue the Koi Nation Shiloh Resort and Casino should be approved to rectify centuries of tribal abuse. Others note the Koi are native to Lake County so have no claim to build in Sonoma County. But what about the Chickasaw Nation of Oklahoma? They will fund, build and manage this \$600 million casino resort, not the tiny 90-member Koi tribe.

This is a classic bait and switch the Bureau of Indian Affairs should easily recognize and rule against. A way for a Southwest tribe to establish a major gaming destination here, and then take profits to another state.

## NUFACTURED CONTROVERSY AT THE OLYMPICS

PACIFIC REGIONAL OFFICE

2024 JUL 22 AM 11:33

BUREAU OF INDIAN AFFAIRS  
July 16, 2024

William and Joan Bolster  
6500 Faight Rd.  
Santa Rosa, CA 95403  
707-843-6453  
billbolster@gmail.com

I135

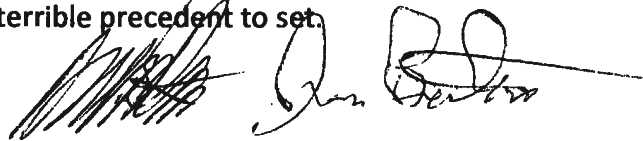
## DEIS Comments, Shiloh Resort and Casino Project

My wife and I have lived at 6500 Faight Rd., Santa Rosa, CA since September, 1977 (almost 47 years).

Here are our objections to the Koi Nation Shiloh Resort and Casino:

1. This development will have a significant impact on traffic on all the surrounding roads. People avoiding the congestion will spill onto our narrow winding country road (Faight Rd.). It is not designed for that.
2. Many of the people visiting the casino will be there to drink and gamble. When they leave, many will be intoxicated and a danger on the narrow roads around the casino.
3. Fire danger. This development is in the path of the last 2 fires, Tubbs and Kinkade. The vineyard is supposed to be a fire break. The development will be fuel for the next big fire.
4. We live in the country and have 2 wells on our property. Until the drought, we had no problems. In the last 5 years one well went dry and the 2<sup>nd</sup> is marginal. We do not irrigate our landscaping anymore and keep our fountain dry. If the Koi Nation builds the development they will draw down the water table more. I will have to drill an expensive deep well. The very least they should do is to get their water from the Town of Windsor or the County of Sonoma so that they live with the same rules others do.
5. This location is not near the Koi Nation's home. That is 48 miles away in Lake County. No other tribe has built a development farther than 15 miles from their home. This is a terrible precedent to set.
6. Sam Salmon, former mayor of Windsor and now on the town council, suggested that the suitable land for this development was on the vacant land south of Home Depot on the south side of Shiloh Rd. Easy access, wide road and just off Hwy 101. Not this location far from the freeway and through residential development.

Do not let this development proceed. There are too many issues with the impact of it. Again a terrible precedent to set.



William and Joan Bolster  
6500 Faight Rd., Santa Rosa, CA 95403  
[billbolster@gmail.com](mailto:billbolster@gmail.com)  
707-843-6453

I136

PACIFIC REGIONAL OFFICE  
2024 JUL 29 AM 11:03  
BUREAU OF INDIAN AFFAIRS

1112 Enzos Way  
Windsor CA 95492

July 25, 2024

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W — 2820  
Sacramento, CA 95825

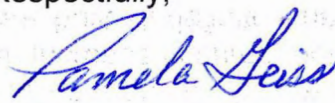
Dear Ms. Dutschke,

I am vehemently opposed to the casino that is proposed for the Shiloh Road area. I am a 30+ year resident of Sonoma County and do NOT see the need for another casino. We have plenty of casinos here and the Rohnert Park, Graton Casino already has plans for expansion. We have a Casino to the north (River Rock) and several in the southern end of Sonoma County. It appears to me that Rohnert Park has experienced an increase in crime, homelessness, and general vagrancy since the Graton Casino was built. It definitely has endured an increase in the number of visitors to the area and I do not view that in a positive light as the visitors are not frequenting other businesses outside of the Casino campus. They have huge busses that bring people in from outside the area. I do NOT see this as a plus for our county.

Specifically, in regard to the Shiloh Road proposal, the Town of Windsor will be most seriously impacted - again NOT in a positive manner. More cars, more crime, increased public safety expenses without the benefit of increased revenues (the casino is actually in Santa Rosa vs. Windsor). When we all evacuated three years ago, the roads were clogged, and it took 3-4 hours just to make it to safety. Adding more people (large hotel and casino) increases the risk for more lives lost during a fire - and there will be another fire. This proposed building site is directly adjacent to homes as opposed to the more remote areas of Graton (on the non-residential side of town) and River Rock (away from residences). Build away from our homes. Build where people can safely evacuate. Build where there is water and the risk of shutting off all electricity (or gas in the case of 2018) is not a factor. Build where the community wants a casino. We do NOT!

This is an appalling use of a beautiful, peaceful setting. I oppose the building of this casino and hotel.

Respectfully,

  
PAMELA GEISS

PACIFIC REGIONAL OFFICE

2024 JUL 31 PM 12: 56

July 28, 2024

BUREAU OF INDIAN AFFAIRS

Bureau of Indian Affairs  
Pacific Regional Office

Amy Dutschke, Regional Director

I am writing my comments regarding the Koi Nation Shiloh Resort planned for Windsor. I live in a mobile home park for seniors within a half mile of the intersection of Old Redwood Highway and Shiloh Rd. They haven't even started building the casino-resort and we have parking issues and noise issues. The location the Koi Nation has chosen is right across from a park used for baseball and a subdivision of houses. On the opposite corner across the 2 streets are two new apartment complexes. Only one is occupied so far and the residents park on both sides of the street so that the park does not have enough parking. I have lived in Colonial Mobilehome Park for almost 30 years. It used to be a rural area with low noise from traffic. Now nearly every night the traffic noise is so loud it is not easy to go to sleep.

It used to take a minute or two to drive out of our mobilehome park onto Old Redwood Hwy. Now it takes 5 minutes or more to get out onto the Old Redwood Hwy. We have more accidents in front of our 2 entrances. We are not the only senior mobilehome park effected by the possible placement of the casino. Mobile Home Estates is right next door to our park.

The quality of life for us residents will go way down if you choose to let this casino placement happen. We keep hearing about comparison to Gator Casino in Rohnert Park. There is no comparison in my mind. Gator was placed a couple miles from the freeway with no subdivisions across the street, no ball park across the street and too close to existing apartment complexes or mobilehome parks. Both of these would be negatively effected by a major casino resort in close proximity. But they didn't get close.

Please advise them that the Pui Nation needs to find another location that would enhance a community not ruin the quality of life to existing residences

I do believe the Kai Nation should try to find their home closer to where their original tribe had connections. The fact that several members are living in Sonoma County is not a reason to approve it for here.

Sincerely  
Patricia Sawyer

## PACIFIC REGIONAL OFFICE

2024 JUL 31 PM 12: 53

Lawrence S. Stern

5839 Leona Ct.

Windsor, CA 95492

BUREAU OF INDIAN AFFAIRS

July 29, 2024

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

RE: DEIS COMMENTS, SHILOH RESORT &amp; CASINO PROJECT

This is my third letter opposing the proposed Shiloh Resort & Casino Project for the following reasons:

1. Our neighborhood is in the Oak Park subdivision built in the late 1980's & is right across Shiloh Rd from the proposed project in a semi rural area.
2. The project will be across the street from a park where youth sports are played & families play & have picnics & also across from a church which has food banks & gamblers anonymous meetings.
3. It is within 2 blocks of another church on Shiloh Rd.
4. We already have water rationing during dry years. How would there be enough water for this project which will supposedly use a minimum of 280,000 gallons of water per day. We would have to let our landscaping die that we've spent thousands of dollars on.
5. Our power grid is already taxed & barely enough to support the existing homes & businesses.
6. We've had to evacuate 3 times in the last few years due to wild fires & its been challenging due to traffic & the fact there's only one way out. With this project in place it would be a nightmare & lives could possibly be lost.
7. This was a sought after neighborhood prior to the casino scare & now houses are taking a lot longer to sell & at lower values.
8. Shiloh Rd is a 2 lane road. The traffic is already bad enough without the casino. The project will ruin this semi rural area.
9. The sewer systems would be overwhelmed.
10. There are already 2 casinos within 15 miles of this area. One north & on south.
11. The Tribe that wants to build this casino are not from Sonoma County & neither is the Oklahoma Tribe supporting them.

12. I've talked to law enforcement working near the other casino's in this county & they all say crime has definitely increased.

I have nothing against Tribe run casino's but this just is not the place for one in a semi rural residential area.

Respectfully,

A handwritten signature in black ink, appearing to read "Lawrence S. Stern". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lawrence S. Stern

PACIFIC REGIONAL OFFICE

2024 JUL 32 AM 9:42

BUREAU OF INDIAN AFFAIRS

July 29 2024

Amy Duschke

Bureau of Indian Affairs

As a resident of the Corbett Circle  
Off faught Rd our family interest  
Should be of primary consideration  
As our children well being would be  
Affected regarding their safety  
Considering Traffic, Polution, and  
The lure of Gambling we must  
Stop the greedy politicians and  
Gaming corporations.

Thanks For Your Support

William Perkins-Taylor  
Barlow 4th grade student at  
San Miguel

Diane K Stern  
5839 Leona Court  
Windsor, CA 95492

PACIFIC REGIONAL OFFICE

2024 JUL 31 PM 12: 54

BUREAU OF INDIAN AFFAIRS

July 30, 2024

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

RE: DEIS COMMENTS, SHILOH RESORT AND CASINO PROJECT

This is my THIRD letter....

I am opposed to the Proposed Shiloh Resort and Casino Project for the following reasons....

1. It is in an existing neighborhood
2. It is close to a park (1 block .. kitty corner) where children play, families have picnics, and youth sports are played.
3. The traffic on the two lane Shiloh Road is already a bottle neck.
4. It will be across Old Redwood Hwy (a 2 lane road) from The Neighborhood Church...this Church not only has religious gatherings BUT serves as a food bank, and has Gambling Anonymous Meetings
5. It is within two blocks of another church on Shiloh Road.
6. There is barely enough water to support the existing homes and businesses let alone a facility that will use in excess of 280,00 gallons of water a day.
7. Our power grid is already taxed and there is barely enough power to support the existing homes and businesses.
8. if we would have to evacuate it would be a logistical nightmare
9. There are already two casinos within 15 miles of the projected site....they are both "local" Tribes...this would take away from their business and livelihood. I doubt that River Rock would even survive.
10. Our property values have already suffered, three houses in our neighborhood (across the street, Shiloh Road from the projected site) have been for sale for over a month...this is a subdivision that has been here since the 1980's...and before the projected casino was a very sought out neighborhood....
11. The Tribe that is in hopes of opening this casino is NOT from Sonoma County nor is the Oklahoma Tribe that will be supporting it.

I will spare you the long story about us retiring to this area (I am a Native Sonoma County person) and finally finding the perfect home and location for us to spend our retirement years...

Please do not approve this project....it is just wrong in so many ways....

Respectfully,



Diane K. Stern

Dear Amy Butchke, July 30, 2024

Please vote NO on the proposed KOI  
Alh Road Casino. We already have too many  
casinos in Sonoma County and they are only  
1 miles apart: Graton Casino in Rohnert Park  
and River Rock Casino in Geyserville along Hwy 101.  
The proposed site is agricultural and residential.  
It would be too much traffic, exhaust and  
noise: bad for humans and the environment.  
Please support clean air and healthy humans,  
support clean air and healthy humans,  
Please vote no. Thank you for your time.

\* Sincerely, Mrs. G. Wilson & family

July 30, 2024

Dear Amy Dutschke:

I find it ridiculous and irresponsible for the Bureau of Indian Affairs to even consider building a resort/casino outside of Windsor for these, among other reasons:

- negative impact of additional traffic on Old Redwood Highway.
- negative impact on our regional water supply - Russian River + tributaries.
- negative impact on existing area casinos & their patrons, employees & supporting businesses on site.

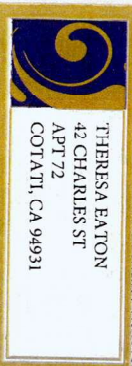
The project proposed is too large & not even on tribal lands of tribe benefiting.

I would like to see some consolidation of existing area casinos with this proposal, rather than establishing a new project. I, and many other long time residents of Santa Rosa, Ukiah, Windsor & Healdsburg enjoy this area for its bucolic settings, scenery, and rural landscapes. We have many nearby, existing casinos and do not need, or want, one more, especially at this site. We do not need to attract more gambling, and gamblers from the Bay Area to our area. Our fragile ecosystem cannot sustain a project of this size!

Sincerely,

Linda Jacobs  
Santa Rosa, CA

EIS Comments  
[ Roi Nation Shiloh Resort + Casino ]



THERESA EATON  
42 CHARLES ST  
APT 72  
COTATI, CA 94931

Leaves, Fern Spring, Known as the "smallest waterfall" in Yosemite.  
Fern Spring is only one of many natural springs in Yosemite.  
The water is so high above percolating  
to the surface that it supports a  
plant moisture supports a  
maple.  
7/30/24  
SAN FRANCISCO CA 940  
JUL 20 2024 PM 2 L



Dear Mrs. Amy Dutsche,

I'm writing to you to

Not give The KOI Nation

Permission to Build

another Casino in Sonoma County.

We have enough Casinos in our

county.

It is very important to

Not build as I stated in

first paragraph.

Please consider a No to

that idea of another casino

here in Sonoma County.

it will ruin Sonoma County  
55825-106629  
SIERRA PRESS

FROM THE YOSEMITE WISH YOU WERE HERE KIT CARD BOOK

Amy Dutsche  
Regional Director

BIA

2800 Cottage Way Room W  
2820

Sacramento CA

BUREAU OF INDIAN AFFAIRS

64:6 AM 32 JUL 2024

PACIFIC REGIONAL OFFICE

PHOTO: © JIM WILSON

PACIFIC REGIONAL OFFICE

July 31, 2024

Bureau of Indian Affairs

2800 Cottage Way Room W-2820

Sacramento, California 95825

Aug  
2024 JUL -2 AM 10:46

BUREAU OF INDIAN AFFAIRS

I am writing this letter in opposition to the KOI Nation Shiloh Road Casino/Hotel/Event Center because of safety and security concerns.

A traffic report was conducted in 2021, which, was before the two enormous apartment complexes were being built, one on Shiloh Rd and one on Old Redwood Highway. These structures will indeed heighten the problem of getting people evacuated from the area should a fire or other catastrophe arise. Also, the impact report was done during the covid pandemic when people were not as mobile as they are now. At the very least there needs to be another analysis and report after these structures are finished. Fire in our area is of the upmost concern and the roads leading to this project are inadequate for the citizens that are living in the area now not to mention if there are another 1000 plus cars at the intersections trying to get to highway 101.

Another concern is about security and safety to the neighborhoods surrounding the project. No other casino establishment in Sonoma County is so close to a thriving neighborhood of seniors, children and hardworking citizens. At the very least there needs to be an ordinance passed that establishes a logical distance from neighborhoods. There has to be an impact to the community due to the noise, the traffic, thievery, sordid behavior, water usage and disposal, garbage, large delivery trucks and wear and tear on the roads, and many other issues. The police and sheriff department will be affected by the amount of complaints and issues. This will indeed require the city of Windsor to raise taxes. How is this a benefit to anyone living in our community?

I am a liberal person and have always felt the treatment of the Indian population to be appalling and it is an embarrassment. However, adding this project to a community that is peaceful, tranquil and beautiful community will just add more problems that some people do not foresee. Realizing future difficulties should be paramount to the decision to proceed.

I listened to the forum last night and was disappointed. It was riddled with carpenter union workers that were in favor of this project due to money and more jobs. This is only a temporary issue, not longterm for them.

Maribeth Forsyth  
Santa Rosa, California. 95404

foresite ma@sbcglobal.net

August 1, 2024

PACIFIC REGIONAL OFFICE

~~2024 JUL -5~~ <sup>AUG</sup> AM 11:36Amy Dutschke  
Regional Director

BUREAU OF INDIAN AFFAIRS

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

RE: EA Comments, Koi Nation Shiloh Resort and Casino

Dear Ms. Dutschke,

I read information about the proposed Shiloh Resort and Casino in Sonoma County, Windsor California. I am opposed to this project.

My understanding is that the Koi Nation is NOT from Sonoma County. The Koi Nation is a tribe from Lake County. Why can a tribe from Lake County develop a casino in Sonoma County?

This proposed casino and resort is in a residential neighborhood. This would be awful to have gambling and drinking in a quiet residential neighborhood. I seriously hope this project does not get approved.

The site is close to Shiloh Ranch Regional Park. So much for the rural park setting that many people enjoy if the resort and casino is approved.

Thank you for taking into consideration my concerns and the concerns of others in Sonoma County.

Sincerely,

Valerie McKamey  
739 Natalie Drive  
Windsor CA 95492  
[vmckamey@msn.com](mailto:vmckamey@msn.com)

**From:** Dan Takasugi <dtakasugi@yahoo.com>  
**Sent:** Thursday, August 8, 2024 9:09 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

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

From:  
Dan Takasugi  
7500 Rafanelli Lane  
Windsor, CA 95492

Subject: EIS Comment, Koi Nation Shiloh Resort and Casino

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

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

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

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

1. First, 2022 was not that long after the Covid pandemic, during which many local businesses were still encouraging and allowing work from home. This decreased the 2022 daily trips throughout this region of Sonoma County, but has now (2024) rebounded to pre-pandemic levels and possibly higher.
2. Second, it is not clear whether the TIS incorporated traffic counts from the currently constructing Shiloh Crossing apartment development located at 295 Shiloh Road. The project includes a total of 173 apartments and 8,000 square feet of commercial

space. Other approved development projects and their expected trip counts should also be incorporated into the existing traffic conditions.

3. ADT counts were taken in July of 2022. This is a season when schools are typically not in session, nor are many after-school activities. A better peak time for ADT counts would have been in April or September of a given year.

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

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

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

Thank you for your consideration of this comment.

Dan Takasugi  
7500 Rafanelli Lane  
Windsor, CA 95492

I147

PACIFIC REGIONAL OFFICE

AUG  
2024 JUL -8 AM 11:08

BUREAU OF INDIAN AFFAIRS

Laura Tapper

31 Ellie Drive  
Santa Rosa, CA 95403  
[nightgardener@hotmail.com](mailto:nightgardener@hotmail.com)

August 5, 2024

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Rm W-2820  
Sacramento, CA 95823Chad Broussard (via email)  
Environmental Protection Specialist, Pacific Region  
Bureau of Indian Affairs  
[chad.broussard@bia.gov](mailto:chad.broussard@bia.gov)**RE: EIS Comments, Koi Nation Shiloh Resort and Casino**

Dear Ms. Dutschke and Mr. Broussard,

I am writing as a direct neighbor to the proposed Koi Nation Shiloh Resort and Casino. By direct, I mean directly across Old Redwood Highway from the southeast corner of the intended property. I am a resident of one of the two mobile home parks that are next door neighbors to each other - Mobile Home Estates and Colonial Park, with Pruitt Creek running between the two parks.

**I DO NOT WANT THIS CASINO!**

The **GENERAL NEIGHBORHOOD ENVIRONMENT** will be ruined for the residents of this unincorporated area and the entire town of Windsor. This is not the area/neighborhood for a development such as this. Currently, it is a residential/semi-rural/agricultural area. There are many single family homes adjacent to a popular town park, Esposti Park, at the intersection of Shiloh East and Old Redwood Highway that is used for little league baseball, soccer, family picnics and a stopping point for many cyclists traveling Old Redwood Highway. There is a County Regional Park also adjacent to the east of the site, used by residents from all over for hiking, dog walking, horseback riding. Both these parks add to the general family friendly atmosphere of the area. A casino will not add to this atmosphere that has been purposely cultivated with the current amenities.

**WATER** is an issue all over California and the surrounding properties mainly get their water from a well. A development of this size will negatively impact the water availability for all wells in the area. This includes the town of Windsor that currently has 2 wells located at Esposti Park that are used for municipal drinking water and irrigation. Mitigation payments to other private parties who have reduced water from their wells will not replace the water...you can't drink money! Additionally, between the two mobile home parks mentioned above runs Pruitt Creek. My understanding is there are plans for the casino to release wastewater into Pruitt Creek. Please note this creek is dry much of the year and floods during heavy rain. Is it also true that part of this creek, that also flows on the proposed casino site, will be rerouted and/or paved over? Is any of this responsible creek or source water stewardship? I think not.

**LIGHT, AIR AND NOISE POLLUTION.** A 24/7 lighted facility with a 400 room hotel, 5000 parking spaces and additional structures will add noise, light and air pollution that will disrupt the local population of people and wildlife.

**TRAFFIC** will be an issue. My understanding is the traffic study was completed during Covid when people were not going out as usual. How can that be used as an accurate measure for traffic impact? Old Redwood Highway is used as a second Highway 101 all day long! It is already difficult to exit or enter my park with the traffic, especially during the morning and all afternoon into the evening. Proposed widening of Shiloh and Old Redwood Highway are not part of the cost which will be born by the casino and most traffic mitigation suggested is inadequate and unrealistic. This doesn't even touch on the issue of needing to evacuate should there be another fire - which is almost inevitable. Evacuation during the Kincadee fire was next to impossible, with Old Redwood Highway, Shiloh, Hembree, etc and Highway 101 backed up, bumper to bumper in every direction. Add another 500 - 2,000 cars, depending on day and time of day and it will be impossible to manage! Remember, power was/will most likely be out and traffic and street lights weren't/won't be working! Traffic control will most likely not be available from Highway Patrol, County Sheriff, or town police - they will elsewhere.

Increased **CRIME** will be an issue. Statistics show, and we know firsthand from the Graton Casino, that crime is a factor. DUIs, drugs, public intoxication, prostitution, human trafficking, etc. will be introduced into our pleasant community. Who will bear the brunt of this or the cost to town and county policing services, or even for Highway Patrol?

**HEALTHCARE** will be impacted and felt by the local medical facilities, already stretched thin at Sutter Memorial Hospital and Kaiser, many still struggling after losing doctors and other medical professionals who left after losing homes in recent fires and the toll that Covid wreaked. This will impact all locals who rely on these services.

The **POWERGRID** will suffer! With climate change, our hot days are hotter and more frequent. AC usage already causes stress on our power grid and power outages will only get more frequent. The power used by the casino will drag an already fragile system and most likely cause rate hikes for this locals.

I'd also like to note:

- The tribes of Sonoma County, mainly the Graton and Lytton Rancherias are opposed because the Koi's tribal land is in Lake County, not Sonoma.
- The mayor and town council of Windsor are opposed.
- Our state representatives, Jared Huffman and Mike Thompson are opposed.
- CA State Senator Alex Padilla and former State Senator Dianne Feinstein are opposed.

I urge the BIA to NOT APPROVE this project moving forward, Plan D in the EIS. I also urge the Koi Nation to consider building in Lake County to improve the employment opportunities and other benefits a casino might bring to their own tribal land.

Respectfully submitted,

Laura Tapper

**From:** Tsim Schneider <tdschnei@ucsc.edu>  
**Sent:** Friday, August 9, 2024 10:31 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

From:  
 Tsim D. Schneider, Ph.D.  
 Department of Anthropology  
 University of California, Santa Cruz  
 1156 High Street  
 Santa Cruz, CA 95064

To:  
 Chad Broussard,  
 Environmental Protection Specialist  
 Bureau of Indian Affairs, Pacific Region

August 9, 2024

Dear Mr. Broussard,

My name is Tsim Schneider. I'm an enrolled Citizen of the Federated Indians of Graton Rancheria, the federally recognized tribe of Coast Miwok and Southern Pomo people whose ancestors faced and survived multiple phases of colonial violence and displacement by missionaries, soldiers, and settlers from Spain, Mexico, Russia, and the United States. I am also an Associate Professor of Anthropology at the University of California, Santa Cruz, where I teach courses on archaeology, colonialism, and Indigenous peoples of California. I am writing to protest Koi Nation's proposal to build a resort and casino at 222 E. Shiloh Road in Santa Rosa, California. To be certain, I have no issue with Koi Nation exercising their sovereign rights under federal law to obtain economic independence and support Koi Nation community membership. **I am calling into question Koi Nation's performance of sovereignty on – and cultural and historical claims to – Indigenous land that is not theirs but is instead a known place within the traditional territory of the Federated Indians of Graton Rancheria, the federally recognized Tribe of Coast Miwok and Southern Pomo people.**

Our history and connection to that place and the surrounding area are unquestionable. Since time immemorial the societies and economies of Coast Miwok speaking peoples and Southern Pomo peoples intersected amicably along the Russian River corridor, Laguna Santa Rosa, and Santa Rosa Plain. As documented by ethnographers, outsiders (neighboring Pomo, Wappo, and others) may have been granted safe passage to the coast and permission to gather food and raw material. However, these interactions were ephemeral, and they do not represent deep ties or equivalent claims to the land. The Koi Nation presents a "Pomo expansion model" to argue their "primacy" in southern Mendocino County and northern Sonoma County. The model attests to the ancient history of Pomo peoples and a homebase in the eastern Clear Lake basin. The archaeological and linguistic evidence appear to suggest a migration of Pomo peoples west from Clear Lake toward the Russian River around 2,500 years ago, representing the beginning of new and *different* Southern and Southwest Pomo cultural traditions and distinct languages. **This evidence does not give the modern Koi Nation of eastern Lake County the right to now claim the spaces that their distant (and distinct) relatives occupied for at least 2,500 years.** It would be similar to someone who speaks Turkish claiming land in France because Anatolian languages were the first to split from a shared Proto Indo-European language family. In this instance, supporting Koi

Nation's startling claims would harmfully overwrite the unique histories, languages, and cultures of the Southern and Southwest Pomo peoples. A dangerous precedent for California Indian Country would also be set.

The Shiloh Road property is part of a place that reflects the unique postcontact history of our Tribe, not Koi Nation. As my research shows, my Tribe is one with ancient and unassailable ties to the land—a territory where our ancestors are buried, where our traditions are kept alive, and where our families continue to gather in community. Koi Nation's website presents a history of Euro-American contact and colonization centered on their traditional home 50+ miles away in eastern Lake County during the mid- to late-1800s, a brutal era of United States settler colonialism and military violence. "As a result," they state, "the Koi Pomo then came to live in communities along the Russian River Valley from Sebastopol to Clear Lake"—a known place, the statement overlooks, for Southern Pomo and Coast Miwok families who have always called it home. Since the late-1700s, by contrast, the ancestors of present-day Graton Rancheria Citizens faced — and resisted — sequential waves of Euro-American colonization by representatives of Spain, Mexico, Russia, and the United States. **For each iteration of greed, land theft, and violence, our ancestors remained connected to their traditional lands and cultural traditions, and they sustained those connections even while families were being pulled apart.** Some fled San Francisco Bay missions seeking protection in their traditional lands. Others evaded wandering padres and soldiers—intruders bent on taking away our land, our bodies and spirits, and our way of life. Still others negotiated settler court systems to gain title to land at Olompali and Nicasio, or defiantly remained living on family homesteads before being gathered together as "homeless Indians" at the Graton Rancheria in the early 1900s.

Tsupu, an ancestor for many Graton Rancheria Citizens including me, fled Rancho Petaluma for the Russian mercantile colony of Fort Ross on the Sonoma County coast sometime between 1834 (when Rancho Petaluma was established) and 1841 (when Fort Ross was sold). To do so and to evade capture, Tsupu chose a route as only a local with knowledge of the land would have been able to do. Her survival and her traditional cultural and ecological knowledge of the land paved the way for her children and grandchildren. More recently, one of Tsupu's great grandkids (and my great grandmother) was born to a Coast Miwok father and a mother who proudly identified as "Pomo" on the 1928 "California Indian Enrollment Application" and hailed from the Healdsburg area (approximately 10 miles north of Shiloh Road). Photographs of family get-togethers at the Russian River and other southern Sonoma County places in the early 1900s—indeed the entire Graton Rancheria Tribe of Coast Miwok and Southern Pomo people—reflect all of the places our ancestors lived, worked, resisted, and remained connected to at all cost. **The history I know, as a Native person and a professional anthropologist, is not Koi history.**

Koi Nation's proposal dishonors the locally-specific Native history of that Southern Pomo place as well as the sovereignty of the rightful descendants, the Federated Indians of Graton of Rancheria, who continue to honor their history and steward their traditional territory of southern Sonoma and Marin counties. In simple terms, 222 E. Shiloh Road is not their land.

Thank you,

Tsim D. Schneider, Ph.D.  
Santa Cruz, California

CC: Amy Dutschke, Regional Director, Bureau of Indian Affairs, Pacific Regional Office

## EIS Comments, Koi Nation Shiloh Resort and Casino

Recently driving home from Santa Rosa to Windsor on Old Redwood Highway, my husband and I encountered a line of traffic stopped dead all the way from where Old Redwood Highway meets Mendocino Ave to north past Mattie Washburn school on Pleasant Ave in Windsor.

What is going to happen when they put a casino at the corner of Old Redwood Highway and Shiloh Ave? Not to mention when the apartment complex across the street is finished and occupied. These narrow 2 lane roads can not handle a huge influx of traffic.

What happens in an emergency when all of Windsor and unincorporated North Santa Rosa is trying to evacuate?

What happens in the next drought year when we are under water conservation restrictions.

It seems that in the rush for some individuals to make money the health, safety and peace for families of the town of Windsor has been totally ignored.

Candace Spring  
6500 Harmon Lane  
Windsor CA  
95492  
707-953-8611

PACIFIC REGIONAL OFFICE

024 AUG 12 AM 11:11

BUREAU OF INDIAN AFFAIRS

EIS Comments, Koi Nation Shiloh Resort and Casino - Windsor, Ca.

PACIFIC REGIONAL OFFICE  
2024 AUG 12 PM 12: 04  
BUREAU OF INDIAN AFFAIRS

Dear Amy:

I'm writing to let you know my thoughts (as well as other locals here) regarding the proposed casino project planned here in Windsor, California. Those of us who live here have many concerns regarding this project: the detrimental impact on the environment - which, at the moment, is a large, beautiful vineyard; the burden this will place on our already scarce water supply and available electricity; the massive contribution to heavy traffic now associated with new multi-unit apartments being built nearby; the impact of higher crime in the area associated with gambling and liquor.

I've lived in Windsor for over 35 years. It's always been a peaceful, beautiful town with open spaces, vineyards, bike paths and parks. In the last few years we've seen rapid growth: apartment units; low-income housing projects; a hotel; a cement factory; a senior memory center complex. This giant casino - placed in the middle of what is now a large vineyard, surrounded by residential homes - will completely ruin Windsor. We certainly don't need another casino in Sonoma County - there are already two others within 8 miles of this proposed site.

I implore you to consider the feelings of the people who have made Windsor their home.

Thank you for your time!

Sincerely,



Jon Bernal  
228 Maili Court  
Windsor, Ca. 95492

*Joan Vallis*

I151

*926 W. Eighth St. Santa Rosa, Ca. 95401*

PACIFIC REGIONAL OFFICE

August 12, 2024

2024 AUG 19 PM 3:08

BUREAU OF INDIAN AFFAIRS

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

**Subject: EIS Comments, Koi Nation Shiloh Resort and Casino**

Dear Regional Director Dutschke,

I am a Tribal Citizen of the Federated Indians of Graton Rancheria and the purpose of this letter is to express my opposition to the Koi Nation of Northern California's project to establish trust land for gaming in Sonoma County, California.

The Koi Nation, previously known as the Lower Lake Rancheria, submitted a restored lands gaming application to the U.S. Department of the Interior (DOI) for a parcel located outside the Town of Windsor, in Sonoma County. The proposed project location is over a 50-mile drive from the Koi Nation's ancestral and cultural roots in the Lower Lake area of Lake County, where its historic rancheria was located.

DOI is supposed to protect tribal sovereignty and this precedent setting proposal by the Koi Nation is actually *undoing* tribal sovereignty. DOI is now being put in the position of pitting Indians against Indians here in California. Our tribes were not removed from their ancestral homelands, like tribes in Oklahoma. In California, tribes were not removed, but were decimated in place. As my Tribe and others rebuild, our Tribal Citizens are returning to their ancestral territories.

DOI must consider an alternative location for the Koi Nation in their true homeland in Lake County. DOI would be wrong to allow for Koi Nation to jump into another tribe's territory by trying to demonstrate a significant historical connection to our Southern Pomo territory based on trade routes or one family moving to our territory. Koi Nation's application is simply a new twist on their previous efforts to acquire gaming sites *outside* of their ancestral territory, which DOI was correct to deny on the same grounds.

I was also raised in Windsor, I was in the first kindergarten class, the family home is still on Wall Street in Windsor which I go to monthly. We still have family functions there and my family is buried in the Shiloh cemetery which I pass on my way to Wall Street. To avoid the crowded 101 freeway I will often use Old Redwood Highway to Shiloh Road. This is the area where the Koi Nation wants to claim as their land. There is a lot of traffic on this road because it is the alternative to using the 101 freeway and to enter and exit the 101 freeway. It is close to a large Walmart shopping center, the large county park, a baseball park, a very large apartment complex that was recently built, not to mention many homes, mobile home parks, apartments and businesses in the area. I have relatives that live in this area. One relative finds it difficult to exit the blacktopped road from her house to Shiloh Rd near the Walmart shopping center.

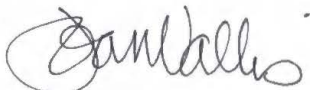
The EIS lacks information regarding water, traffic, evacuation for fire or smoke. I had to evacuate in Santa Rosa in 2019 or 2021 and I was scared because the roads were at a standstill. That area was bad in 2017 when the fire came over that mountain. It was bad for evacuating then, there is now a big apartment

complex on Shiloh and Old Redwood Highway and I understand that another is being built. What will happen when 5,000 additional cars are added plus the additions of cars from the apartment complexes try to evacuate. Another apartment complex is also being added to that area. My nephew and his family live in a subdivision off Faught Road. There is so much in that area that has not been included in the EIS. The EIS is inaccurate, the help from local fire departments is inadequate. A family member lost his home in the 2017 fire and several other tribal members lost their home. It was horrible. A casino does not belong in such an impacted area.

The plan is to put in 7 wells as an answer to water. We just went through a drought crisis last year. We used to have a well on Wall Street until we got hooked up to the city water. People still have wells in the area of the proposed casino. Some people with wells said when vineyards came in the vineyard owners were able to dig further down for water and in the times of drought, their wells had problems with getting water. What's going to happen when 7 wells are put in and are able to dig further down. The worry is, will the homes in the area have sufficient water and pressure to put out a fire when there is a drought. It's frightening because all of us in this area have gone through this. This is now considered a dense area with small roads, many people still on wells.

I would greatly appreciate you considering another location for the Koi Nation casino in their ancestral territory in Lake County because of all the reasons I have stated. Otherwise, this project should be denied.

Respectfully,

A handwritten signature in black ink, appearing to read "Joan Vallis", with a stylized flourish at the end.

Joan Vallis  
926 W. Eighth Street  
Santa Rosa, CA 95401

**From:** Paul Lomeli <paul\_lomeli@keysight.com>  
**Sent:** Friday, August 9, 2024 11:31 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

Dear Mr. Broussard:

I have been a resident of Sonoma County for 25+ years in the vicinity of the proposed Koi Nation Shilo Resort and Casino at:

5388 Marigold Lane  
Santa Rosa, CA 95403

I was at home the night of the Tubbs fire in 2017 and I was a volunteer with the American Red Cross at the time. That wildfire was a weather driven event as the weather took a strange turn that night. That evening I received a call from the Red Cross to report to the office to volunteer to help with setting up an evacuation shelter in Calistoga. After an hour of volunteering I received an emergency notification from the county that my residence address was to be evacuated. I went home and helped my wife evacuate our house with our pets in her vehicle. I will never forget the bright orange sky with the fire heading west over the hill just southeast of Shiloh park. There was a continuous barrage of propane tank explosions in the background and it was clear the fire was heading our direction. She headed south to her brother's house across town and I told her to call me when she arrived. I went back to the Red Cross and was reassigned to assist with the evacuation shelter operation at the Finley Center in Santa Rosa. My wife took several hours to head across town to arrive at her brother's house for a trip that normally takes 15 minutes due to traffic on the road with everyone heading away from the fire. It took an hour+ for me to get to the evacuation shelter at the Finley Center that night when normally that would also only take 15 minutes. I was assigned traffic duty on the road outside the Finley Center to instruct people where to go depending on if they were going to enter the shelter or continue heading west or south and find somewhere else to go. Traffic on the two lane road was essentially a parking lot moving at 10 mph maximum due the large number of cars trying to escape the fire. Mind you this was after midnight on a Sunday and the traffic jam lasted until the hour just before dawn. That night and the days that followed I heard numerous reports from my neighbors in the Shiloh, Larkfield, Wikiup area stating they drove through the flames to evacuate the fire and in some cases were stuck in slow traffic while doing so.

Imagine my surprise to learn that there is interest in adding a resort and casino potentially adding a high number of people/vehicles in the same area where it was already difficult to evacuate a wildfire with limited evacuation routes based on my experience that night and other wildfire evacuations since 2017.

I read the EIS and was very interested in the mitigation plan for wildfire evacuation. I was extremely disappointed to learn there was no mitigation to plan for more vehicles on the road during an evacuation. I was hoping to read some civil engineering type studies about taking A hours for x number of vehicles to evacuate a given neighborhood and that the casino/resort

would add an estimate of y number of vehicles and it would that an additional B hours to evacuate the  $(x + y)$  vehicles. I would also like to see a plan that would estimate at C hours where someone's life was at risk because they were stuck during the evacuation. I did not see such detailed analysis.

Based on the current EIS, my experience, and no details on would adding this much population to the area put human life at risk in the event of a wildfire disaster I cannot support the plan for the Koi Nation Shiloh Resort and Casino.

Best regards,

Paul Lomeli (he/him/his)  
Integration Engineer  
Precision Mesoscale Technology Center | Technology Order Fullfillment

Keysight Technologies, Inc.  
1400 Fountaingrove Parkway | MS 4LSB  
Santa Rosa, CA 95403-1783

707 577-5514 **T** | 707 577-3833 **F**  
[www.keysight.com](http://www.keysight.com)

**From:** Gilbert Hodges <ghodges8@cox.net>  
**Sent:** Friday, August 9, 2024 2:20 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Koi proposal

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

Hello Mr. Broussard, my name is Gilbert Rodney Hodges and I am a member of The Graton Rancheria California Indian tribe. I'm writing to express my opposition to the proposed Casino project that the Koi people wish to build in Sonoma County. I and many others feel that this is a direct assault on our sovereignty as the Koi are not from this area. This project has the potential to set a negative precedent regarding sovereignty of ALL Indian tribes in the United States. This will not affect our tribe only and is very serious matter that should concern Native Americans everywhere in the USA. I ask you to reject this proposal in order to keep and strengthen Tribal sovereignty in the United States. Thank you for your time. Gilbert Rodney Hodges, Federated Indians of Graton Rancheria.

[Sent from Yahoo Mail for iPhone](#)

**From:** Nancy Daher <nldaher48@gmail.com>  
**Sent:** Friday, August 9, 2024 5:04 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Koi Nation Casino Project

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

Chad Broussard,

Exhaust, congestion and noise is under calculated in the draft environmental report on the Koi Nation's proposed Shiloh Casino.

The two lane road in a dense quiet neighborhood could be disastrous in a fire. My husband and I lost our house in the Tubbs Fire in 2017. Along with the horror we experienced, we faced gridlock on Old Redwood Highway trying to evacuate to our daughter's house in Windsor.

The proposed casino is across the street from a park where children play sports.

A peaceful neighborhood will be punctuated by sirens to the Casino. My friend in Rohnert Park can attest to the increase in sirens going to Graton Casino once Graton was built.

The Koi Nation did not own land at the proposed Shiloh site.

Also a five story apartment building is almost completed caddy corner to the proposed casino which adds more cars on the road and feeder roads to Highway 101.

This is a dangerous proposal to our children and our lives. The location does not support a huge casino and hotel.

Thank you,  
Nancy Daher

Sent from my iPhone

**From:** Paula Marckesano-Jones <pmarckesanojones@gmail.com>  
**Sent:** Saturday, August 10, 2024 7:31 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EA Comments, Scotts Valley Casino and Tribal Housing Project

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

Regarding the proposed casino in Vallejo: Considering the harsh economic conditions many of our community members are experiencing and the addictive nature of gambling, I would expect that built into any agreement to allow a casino is a clause fully funding the education and treatment for gambling addictions necessary to avoid further hardships to struggling families.

**From:** Laura Wecksler <ousemousehouse@hotmail.com>  
**Sent:** Friday, August 9, 2024 3:21 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

August 9, 2024

Chad Broussard  
Environmental Protection Specialist  
Bureau of Indian Affairs, Pacific Region  
[chad.broussard@bia.gov](mailto:chad.broussard@bia.gov)

Dear Mr. Broussard,

I am an enrolled citizen of the Federated Indians of Graton Rancheria, located in Rohnert Park, Sonoma County, California. My tribe and I vehemently oppose the construction of the Koi Nation Shiloh Resort and Casino in Windsor, California. The establishment of such a facility not only directly places a different Nation within our ancestral Tribal territory but would compete with a major source of needed funding for our Tribal elders, youth and citizens.

As an Environmental Protection Specialist, I would hope that officials such as yourself and indeed the entire BIA, be in the interest of maintaining Tribal sovereignty as a matter of the utmost respect, regard and consideration. Allowing a Nation with no historical or federally recognized ties to establish gaming rights within another Tribe's established homeland inherently pits Indigenous peoples against one another and denies the right to sovereignty Native people have fought so hard to obtain post-colonization. It also sends a message to our Tribe that the BIA does not support our best interests.

Below, I have included a Google Maps screenshot of Windsor, CA and the surrounding area. As a matter of comparison, I have included a screenshot of the same location from Native Land Digital, a website which provides territory markings of Indigenous Peoples, Tribes, Bands and Nations worldwide. While it does not represent legal boundaries, it does seek to inform and educate others about "territory awareness" to help undo the colonized history we have all been taught. Most notably, the area in which the Koi Nation seek to establish a facility is right in the middle of Kashaya/Southern Pomo/Graton Rancheria land.

\* Google Maps. Windsor, California. Retrieved August 9, 2024. <https://www.google.com/maps/place/Windsor,+CA/@38.2572104,-122.8668381,10z/data=!4m6!3m5!1s0x808417008c262189:0x58fe667f522195c2!8m2!3d38.5471327!4d-122.8163802!16zL20vMHI3OTk?authuser=0&entry=ttu>

\* Native Land Digital. Windsor, California. Retrieved August 9, 2024. <https://native-land.ca>

I beseech you, within your authority, to reconsider the Koi Nation's plan, Mr. Broussard. We acknowledge that the atrocities of history cannot be undone. We are aware of the inequities which persist to this day. The question is, how can we responsibly and respectfully move forward given this knowledge?

Thank you for your time and consideration.

Respectfully submitted,

Laura (Ouse) Wecksler

August 9, 2024

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

PACIFIC REGIONAL OFFICE  
2024 AUG 19 PM 3:32  
BUREAU OF INDIAN AFFAIRS

**Subject: EIS Comments, Koi Nation Shiloh Resort and Casino**

Dear Regional Director Dutschke,

I am an enrolled citizen of the Federated Indians of Graton Rancheria, located in Rohnert Park, Sonoma County, California. My tribe and I vehemently oppose the construction of the Koi Nation Shiloh Resort and Casino in Windsor, California. The establishment of such a facility not only directly places another Nation within our ancestral Tribal territory but would compete with a major source of needed funding for our Tribal elders, youth and citizens.

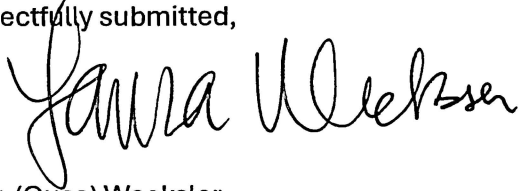
As a Regional Director, I would hope that officials such as yourself and indeed the entire BIA, be in the interest of maintaining Tribal sovereignty as a matter of the utmost respect, regard and consideration. Allowing a Nation with no historical or federally recognized ties to establish gaming rights within another Tribe's established homeland inherently pits Indigenous peoples against one another and denies the right to sovereignty Native people have fought so hard to obtain post-colonization. It also sends a message to our Tribe that the BIA does not support our best interests.

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I beseech you, within your authority, to reconsider the Koi Nation's plan, Regional Director Deutschke. We acknowledge that the atrocities of history cannot be undone. We are aware of the inequities which persist to this day. The question is, how can we responsibly and respectfully move forward given this knowledge?

Thank you for your time and consideration.

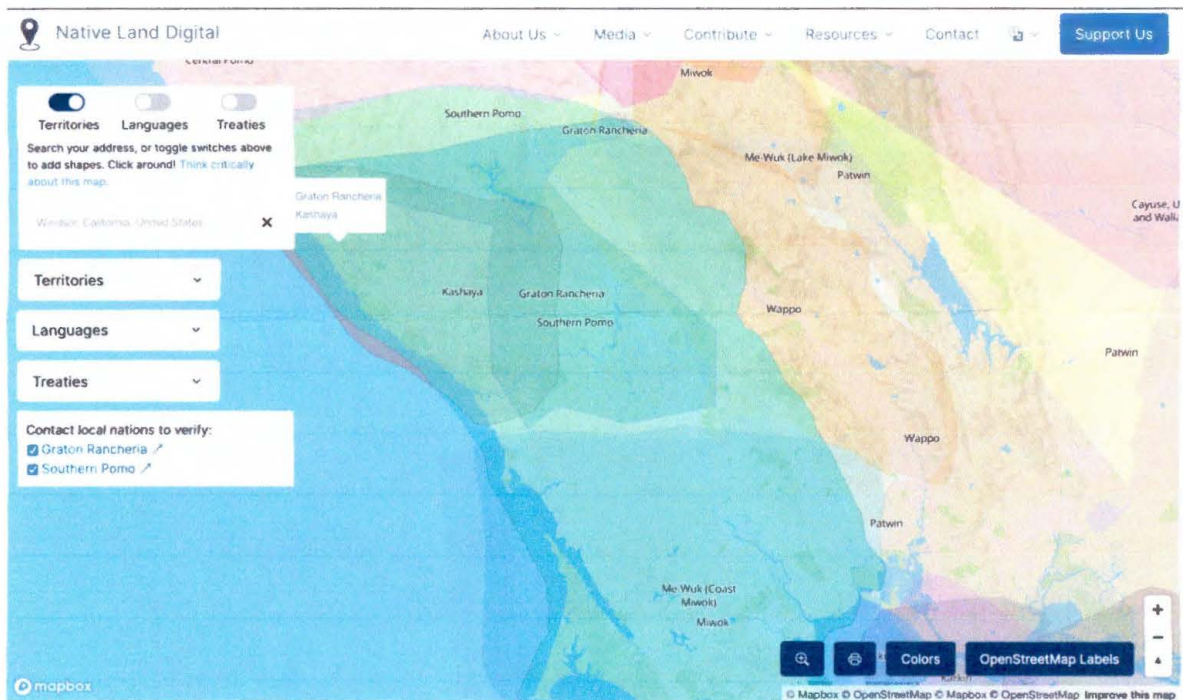
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Laura Wecksler". The signature is written in a cursive, flowing style with a large initial "L".

Laura (Ouse) Wecksler



\* Google Maps. Windsor, California. Retrieved August 9, 2024. <https://www.google.com/maps/place/Windsor,+CA/@38.2572104,-122.8668381,10z/data=!4m6!3m5!1s0x808417008c262189:0x58fe667f522195c2!8m2!3d38.5471327!4d-122.8163802!16zL20vMHl3OTk?authuser=0&entry=ttw>



\* Native Land Digital. Windsor, California. Retrieved August 9, 2024. <https://native-land.ca>

August 19, 2024

I158

To: Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Rm W-2820  
Sacramento, Ca 95825

Subject: EIS Comments KOI Nation  
Shiloh Resort and Casino

Dear Regional Director Dutschke,

I am a Tribal Citizen of Federated Indians of Graton Rancheria. I'm writing this letter to express my opposition to the project to establish trust land for gaming in Sonoma County by the KOI Nation, which is located in Lower Lake, County of Lake. More than 50 miles away from the Town of Windsor where they want to propose a future Casino.

They are a separate Tribe from ours. We have followed the rules and established our business on our homeland as required by DOI. Allowing the KOI Nation to locate

and build on our ancestral land of the Coast Miwok and Southern Pomo is not right and will cause problems between the two separate ~~tribes~~ tribes. Also the DOI is supposed to protect Tribal Sovereignty. This would be a step backwards against that.

Tribes have traded and bartered with each other and passed through other tribes' homeland, but ~~with~~ <sup>with</sup> the ~~the~~ permission of the homeland tribe or go to war. This is not the case here. They don't have the right or permission of Shasta Rancheria. This is our homeland! It has been a long road to where we are now.

We have always been here, they have not.

Please help us keep it right. The KOT Nation should build on their ancestral land, in Lower Lake, Lake County not Sonoma County.

Respectfully and Sincerely,  
Peter Rojas Pulido P.O. Box 895, Lake Hughes, Ca 93532

**From:** Anne Devlin <cadevlin@tsoft.com>  
**Sent:** Sunday, August 11, 2024 1:57 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

**Anne Devlin**  
 50 Plymouth Way  
 Santa Rosa, CA 95403

August 11, 2024

Amy Dutschke, Regional Director  
 Bureau of Indian Affairs, Pacific Regional Office  
 2800 Cottage Way, Room W-2820  
 Sacramento, CA 95825  
 Chad Broussard, Environmental Protection Specialist  
[chad.broussard@bia.gov](mailto:chad.broussard@bia.gov)  
 Re. EIS Comments, Koi Nation Shiloh Resort and Casino

Dear Ms. Dutschke and Mr. Broussard:

I reside 500 yards from the above proposed project's entrance, and I urge the BIA to reject the conclusion in the draft EIS published July 8, 2024 to the effect that adverse environmental effects could be mitigated.

- The project would subvert the County of Sonoma's zoning plan and commitment to residents to preserve open space and agricultural use.
- The EIS does not assess the project's potential increase of need for law enforcement and emergency services or address the capacity of local agencies to supply services. In this county area outside city limits, we don't even have patrol. The county law enforcement does not enforce traffic, and we have only the CHP, whose cars are on the freeway rather than on our two-lane roads. "Proposing to enter into a contract" for law enforcement and emergency services is not meaningful.
- The proposals concerning restriping pavement don't address the inadequacy of the width of the roads to add lanes.
- No amount of disaster preparedness is going to change the fact that there aren't enough roads to evacuate the increased population of the proposed projects.
- "The use of BMPs would minimize impacts...no mitigation required", repeated seems facile. The practices are not defined or described. No one who lives in the neighborhood believes that any version of this project would be insignificant.

Please don't allow a casino or hotel here. Thanks for your consideration.

Very truly yours,  
 Anne Devlin

ANNE DEVLIN  
 (760) 668-8358

[cadevlin@tsoft.com](mailto:cadevlin@tsoft.com)

*Rachael A. Brune*

I160

4550 Petrie Lane Santa Rosa CA 95409

PACIFIC REGIONAL OFFICE

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

2024 AUG 19 PM 3:01

BUREAU OF INDIAN AFFAIRS

**RE - EIS Comments, Koi Nation Shiloh Resort and Casino**

This letter is in response to the Environmental Impact Statement published on July 12, 2024 concerning the fee-to-trust application and proposed development of the 68 acre property located on the southeast corner of Old Redwood Highway and E. Shiloh Road by the Koi Tribe. I have reviewed it and feel strongly that it has not addressed the many conflicts and problems this project will cause.

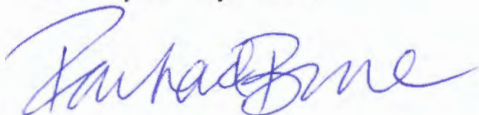
I, like so many residents are opposed to this project for many reasons. The location of the hotel, casino and concert center will require significant amount of resources. The mass amount of water usage will require a new deep well as well as a massive wastewater treatment facility. This along with all the parking needed for these venues is just misplaced and inappropriate for a predominately residential and agricultural area. It is also poorly located from a traffic and potential evacuation route.

As a resident living nearby who had to evacuate my home at a moments notice in 2017 and 2020 due to an oncoming wildfire, I know first hand how important it is to have as many evacuation routes as possible in the likely event of another wild fire in our area. This large complex right in the middle of so many family neighborhoods with 2 lane roads will be completely inadequate and very dangerous in the case of an evacuation. The surrounding roads simply cannot support a largescale evacuation in an effective and safe manner.

Our county water resources are decreasing every year and should be prioritized for its existing needs particularly for agricultural and residents. To propose a new well and water treatment plant just for this project is excessive and will very likely result in the drawdown on the existing shallower wells that residents and farms or ranches surrounding that area depend on.

As Sonoma County residents we already have multiple choices for gaming and entertainment. For a county to house three different casinos is excessive when there are so many other critical needs to be addressed. The negative effects far outweigh the positives. Please consider my objection to this misplaced project.

Thank you very much,



Rachael Brune

**From:** Virginia Pucciarelli <mariavirginiaschiff@gmail.com>  
**Sent:** Sunday, August 11, 2024 9:44 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

Dear Mr. Broussard,

I'm just a single mom with two young kids and Windsor resident. I'm writing from a perspective of a 12 year resident who drives the Shiloh intersection at least once a day. Our Windsor infrastructure is not capable to sustain another casino (By another I mean in Sonoma county). It's not capable in terms of traffic And water To name others. I wonder if it's even safe.

I don't know where you reside, but our county, Sonoma, does not need another casino.

It might be another source of employment for a few, but it's going to damage hundreds of people that live nearby.

Please keep in consideration the people voice.

Sincerely,

Maria Virginia Schiff  
156 Bouquet Cir, Windsor, CA 95492

**From:** Lesley Alexander <lellya@comcast.net>  
**Sent:** Monday, August 12, 2024 7:16 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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We're writing yet another letter as to why we oppose building a casino on this property. Apart from the issues we have already brought up - traffic, noise, parking, where the water will come from, evacuation nightmare in the event of wild fires, the fact that

officials reached an agreement with the Lytton Band of Pomo Indians in 2015 to refrain from building a large planned casino on their sovereign land in north Windsor or anywhere else in the county.

Now we learn that the economically powerful Chickasaw Nation of Oklahoma is partnering with the Koi Nation to fund/build/mange this casino - not the small Koi Nation apparently consisting of a 90+ member tribe native to Lake County and not Sonoma County. Where will the profits go - Oklahoma? Who will fund upgrades to Shiloh Road and surrounding area - the taxpayers? Bait and switch?

We urger you not to approve this application for a casino.

Respectfully,

Lesley and Jerry Alexander  
Anna Drive, Windsor

August 17, 2024

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

PACIFIC REGIONAL OFFICE

2024 AUG 21 PM 1:26

BUREAU OF INDIAN AFFAIRS

RE: DEIS Comments, Shiloh Resort and Casino Project

Dear Ms. Dutschke:

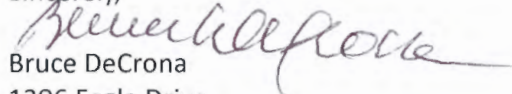
I have lived in the Town of Windsor for 28 years, approximately 3 miles from the proposed Koi Shiloh Resort project. This letter is to once again voice my extreme opposition to this project, which would destroy the quality of life and safety in our town. In addition to the quality of life concerns in this proposed residential area such as traffic and noise as well as environmental impacts, I would like to emphasize the following two serious safety concerns.

- **Wildfire Evacuation** – I have lived through the evacuations of both the Tubbs Fire and the Kincade Fire and know first-hand how dangerous this situation is. We live in an area surrounded by extreme, very high and high wildfire risk. This project would replace the vineyard, which is a natural fire break, with a casino, hotel, spa, event center that would increase the fire risk. We are aware that another wildfire in our area is when, not if, and we know the tragic consequences of inadequate evacuation routes from the Paradise Fire and the Maui Fire. Adding a project of this size to our already stressed two lane roads would very likely cause gridlock and a real potential for loss of life robbing us of our peace of mind and will cause constant fear for our safety in our own homes. The EIS is faulty in the assumption that we will have adequate warning to evacuate the casino property prior to safely evacuating the Town of Windsor.
- **Crime** – The proposed mitigation to address this issue by staffing up the police department in response to the increased crime is not acceptable. The proposed location of the casino project is right across the street from neighborhoods with families and retired people. The knowledge that police are available to respond after a dui accident or worse occurs will not alleviate the impact and fear of these crimes in our community.

It appears that the only supporters of this project do not live in this area and only wish to profit financially. As for the claim that it will create many new jobs, the unemployment rate in this area is very low with many help wanted signs in local businesses. The proposed site is not in a commercial area. It is in an agricultural, residential area where families and retired live, children go to school and play in the park, wildlife live, and we all enjoy the incredible natural beauty of this area. The proposed location is absolutely **not** the right location for this project.

I wholeheartedly request that you implement **Alternative D, no action.**

Sincerely,

  
Bruce DeCrona  
1206 Eagle Drive  
Windsor, CA 95492

**From:** Ann Galbraith <agal@sonic.net>  
**Sent:** Monday, August 12, 2024 3:22 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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Windsor is known as a "family" town, and the last thing we want is another gambling casino in the area. It just leads to a habitual waste of money and drunkenness, hardly family values. Why can't Indians find a decent way to make a living instead of ruining the lives of others?

**From:** Gabriel Greene <gabrielgreene30@gmail.com>  
**Sent:** Tuesday, August 13, 2024 6:08 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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Hello

I wish to express my strong opposition to the Koi nation casino in Windsor CA. There are already two casinos in Sonoma County and I don't believe we need another one. I am also very concerned about the proposed location of the casino as it would have a harmful effect on traffic congestion and is near a residential neighborhood.  
Please do not approve this project.

Sincerely  
Gabriel Greene  
707 Willowood Way, Windsor, CA 95492

**From:** c7evans@aol.com <c7evans@aol.com>  
**Sent:** Tuesday, August 13, 2024 11:14 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Subject: EIS Comments, Koi Nation Shiloh Resort and Casino

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Dear Environmental Protection Specialist  
Bureau of Indian Affairs, Pacific Region

As an 80 year old elder of Federated Indians of Graton Rancheria, I am writing to ask for protection of my tribe sovereignty.

As a child spent time with my Uncle Tom Smith, Tsupu, and mother on the fishing piers in Bodega Bay.

The Koi Nation is far from my ancestral homeland.

Pleas protect Tribal Citizens to their ancestral territories and not undoing tribal sovereignty. By allowing the Koi Nation to undo tribal sovereignty, you will be removing our ancestral homelands.

Please do not undermine my tribe sovereignty and detriment my identity and Cultural right of federally recognized tribes in Sonoma County.

Please consider another location for the Koi Nation casino in their ancestral territory in LAKE COUNTY.

This project should be denied.

Respectfully,

Caroline Frances Evans  
260 Corral de Tierra RD  
Salinas, CA. 93908

**From:** spinola1 kashiaservices.com <spinola1@kashiaservices.com>  
**Sent:** Tuesday, August 13, 2024 2:49 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Cc:** Dutschke, Amy <Amy.Dutschke@bia.gov>  
**Subject:** [EXTERNAL] Opposition Letter to the Koi Nation Casino Project

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

Dear Mr. Broussard,

Hello, my name is Sandra Pinola, I am a member of the Kashaya Band of Pomo Indians, located in Stewarts Point Sonoma County, CA and I have lived in the Town of Windsor for 32 years.

On April 5 2022, the Sonoma County Board of Supervisors adopted a resolution opposing the attempt to take **222 East Shiloh Road, Sant Rosa, CA** into trust land for the Koi Nation. My tribe the Kashaya Band of Pomo Indians also adopted and submitted a Tribal Resolution to oppose this project along with four other tribes.

I am opposed to this project for the following reasons:

First and foremost, **this is Not their ancestral territory**, they are from Lake County, CA. The BIA should not approve this!

Second, they currently have a lawsuit against the **City of Clearlake, CA**. The Koi Nation maintained that the City Clearlake improperly filed for CEQA exemption status on a city project.

**And are irreparably harming the Koi Nation, it's ancestors and its cultural artifacts which are potentially eligible for the California Register of Historic Resources, archaeological site CCL-21-01.**

**As such, the Koi Nation cannot have it both ways. If there is proof of their ancestors are already documented in Clearlake, CA then that would show that SONOMA COUNTY is not their territory and never has been.**

**If this land is taken into trust for Koi Nation it will be in grave error.**

Thank you,

Sandra Pinola,  
Kashaya Band of Pomo Indians, tribal member

**Resident of Windsor, CA 95492**

**spinola1@comcast.net**

**From:** Vincent Wii. the. psfr Mendoza <vinent836@gmail.com>  
**Sent:** Tuesday, August 13, 2024 4:36 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Kio Nation Shiloh Resort and Casino

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

Dear Regional Director Dutschke,

It is with great pride that I share the title of Tribal Citizen of the Federated Indians of Graton Rancheria. In this letter, I would like to express my concern about the proposed location for the Koi Nation casino that should remain in Lake County instead of going elsewhere. A casino located on the territory of another tribe would seem to be inappropriate to me, and I believe that it would not be appropriate at all. The casino should be established on the lands that are owned by each tribe, and if I don't think this principle is being respected, I cannot support the casino at all. I do not think that sending this proposal to another tribe would be fair or respectful and I do not support the proposal. I believe that a casino should be located on the territory of its rightful owner, and I agree with this principle. I believe that any casino should be established on the lands of the tribe that owns it, and no other tribe should be involved in its operations. I believe that this principle should be respected and that any proposal that goes against this principle should be rejected.

-Vincent Mendoza  
2000 W. Vine Street  
Lodi, CA 95242

**From:** rcdccmy@aol.com <rcdccmy@aol.com>  
**Sent:** Tuesday, August 13, 2024 5:07 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] DEIS Comments, Shiloh Report and Casino Project

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

August 13, 2024

I am writing regarding the Koi Shiloh Casino Project. We have raised our family in the neighborhood directly across the street from the proposed site. We have lived here for 27 years.

It is very alarming that the Koi Nation would choose a residential property on a quiet country road. As I am sure you are aware, not only is the property surrounded by neighborhoods, but by a church, youth park and baseball field, as well as an elementary school. This is not the right spot for a large casino project.

I believe that the EIS 2022 TIS traffic data is now too old to be used for this EIS analysis for the following reasons. First, 2022 was not that long after the Covid pandemic, during which many local businesses were still encouraging/allowing work from home. This decreased the 2022 daily trips throughout this region of Sonoma County, however now (2024) traffic has returned to pre-pandemic levels and probably higher.

In addition, did the TIS traffic counts take into consideration the new construction developments on both Shiloh Road and Old Redwood Highway? The biggest of these new developments is the Shiloh Crossing Apartment development located at 295 Shiloh Road. The project includes a total of 173 apartments and 8,000 square feet of commercial space.

The ADT counts were taken in July of 2022. This is a season when schools are not in session, nor are many after-school activities. Cars typically line up and down Shiloh Road, when sports are happening in Esposti Park. A better peak time for ADT counts would have been in April or September of a given year.

Therefore, I request that the EIS perform a new TIS which includes recent traffic counts and incorporates expected new developments within the project study area. I believe new traffic counts will more accurately represent this area and show that this is not a viable location for a casino. We would ask that further studies are done. **The only viable option right now is**  
**O tion D.....no ro'ect**

Respectfully,  
 Ron & Carrie Myers  
 5834 Leona Ct. Windsor, CA 95492

**From:** gary hodes <trinitoid469@gmail.com>

**Sent:** Tuesday, August 13, 2024 5:59 PM

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

**Subject:** [EXTERNAL] Concerns Regarding the Koi Nation's Land-into-Trust Application

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

Greetings Mr. Broussard,

I am writing to express my concerns regarding the Koi Nation's application to take land into trust in Sonoma County for the purpose of establishing a reservation and casino. While I respect the Koi Nation's right to self-governance and economic development, this proposal undermines the sovereignty of local tribes whose ancestral lands are within the proposed site.

#### Historical Context and Sovereignty Concerns

The Koi Nation's historical lands are located approximately 50 miles away in Lake County. The proposed site in Sonoma County falls within the traditional territories of other federally recognized tribes. By establishing a reservation within these boundaries, the Koi Nation's proposal risks infringing upon the sovereignty and self-determination of these local tribes. Sovereignty is a fundamental principle that allows tribes to govern themselves and manage their own affairs without external interference. The imposition of another tribe's reservation within their ancestral lands could lead to conflicts over jurisdiction, resources and cultural heritage.

#### Impact on Local Tribes

The local tribes have a deep, historical connection to the land in Sonoma County. We have managed and protected these lands for generations, maintaining our cultural practices and traditions. The introduction of a new reservation and casino by the Koi Nation could disrupt these practices and lead to significant cultural and environmental impacts. Additionally, the economic benefits promised by the Koi Nation's casino may not be equitably shared with the local tribes, potentially leading to economic disparities and tensions.

#### Legal and Ethical Concerns

While the Indian Gaming Regulatory Act (IGRA) provides a framework for tribes to establish gaming operations, it is crucial to consider the broader implications of such developments. The Department of the Interior has a responsibility to ensure that the rights and sovereignty of all tribes are respected. Approving the Koi Nation's land - into - trust without thorough consultation with the affected local tribes could set a concerning precedent for future land disputes and undermine the principles of tribal sovereignty.

#### Conclusion

In Conclusion, I urge the Department of the Interior to carefully consider the implications of the Koi Nation's land - into-trust application. It is essential to engage in meaningful consultation with the local tribes and ensure that their sovereignty and rights are not

compromised. By doing so, we can uphold the principles of fairness, respect, and self-determination that are foundational to tribal sovereignty.

Thank you for your attention to this matter.

Sincerely, Gary L. Hodges, citizen of the Federated Indians of the Graton Rancheria

**From:** debra marincik <leis1qt@gmail.com>  
**Sent:** Thursday, August 22, 2024 11:33 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Koi Nation proposal

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

This is written in opposition to the Koi Nation's proposal to construct a casino in Windsor. The strain on existing water resources in an area of California that has remained on drought watch should have been sufficient in stopping any plans before they began.

There will be a significant increase in traffic by automobile and by foot. This could complicate any potential evacuations should they become necessary as the threat of wildfire in this area is very real.

Now quiet, established, crime free neighborhoods will most certainly experience elevated noise levels and an increase in criminal activity.

Along with the many valid reasons listed above is the Koi Nation's questionable land claim. Currently there are two Native American tribes with long standing roots in this area running two casinos in Sonoma County.

There is no need for another.

Debra Marincik  
68 Ellie Drive  
Santa Rosa, CA 95403

**From:** Marilyn Volpert <peanutsgrama@yahoo.com>  
**Sent:** Tuesday, August 13, 2024 6:25 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] The Koi casino in Windsor California

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Hello Chad.

I have written to you about the proposal to build a large casino/resort spa and homes on the corner of Shiloh Road and Old Redwood here in Windsor.

I had written about the environmental problems before, but something happened today that you may like to hear about. There was a huge gas leak on that exact corner today. Residents were warned and told to shelter in place. This made us realize that the street on that corner is one lane in EACH direction. On Shiloh and Old Red. There are other homes, Parks, and a very large apartment that just was finished on that corner also. Suppose it was an evacuation??

You realize we are in a wildfire area, don't you? And on an earthquake fault? How on earth, with the added cars, residents, gamblers and criminals that seem to come with casinos, are we supposed to escape...there are often times, traffic so bad, without all that, that we will be jammed. Just jammed. One lane in each direction.

The prospect of the environmental disaster (the human/earth combo) is unbelievable stupid and frightening.

I know the contractors were jamming the calls on the Zoom meeting last week. THEY mostly were out-of-towners, per my Union friend. They want work, at the Windsor citizens expense.

I really appreciate you taking this time to read my 84 year old wise lady thoughts.

Marilyn Volpert 8085 A Street Windsor, Ca. 95492

**From:** Alejandra Patrick <Apatrick98@outlook.com>  
**Sent:** Tuesday, August 13, 2024 9:24 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

To whom it may concern,

I Alejandra Rose Patrick, a citizen of the Federated Indians of Graton Rancheria opposes the Koi Nation from building a casino on my peoples and ancestors' land.

It's disrespectful to allow the koi to even propose the idea as they know themselves is not true, that they could possibly construct a casino in our territory/ sovereign land. It's simple to recognize what shall be done right by our people.

Sovereignty will be destroyed. Please do what's right and oppose this absurdity.

Thank you  
Alejandra Patrick

**From:** Vicki Walling <rvcwalling@att.net>  
**Sent:** Tuesday, August 13, 2024 9:41 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] proposed Koi Nation casino-resort in Windsor, CA

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Please do not approve of this casino in this area. There are already enough casinos in this area, for example, the one just down the highway in Rohnert Park. There's also River Rock in Geyserville, Twin Pine in Middletown, Napa Valley Casino, and Cache Creek Casino. The proposed Koi casino is much bigger than any of these existing ones. The proposed casino is in a residential area which will cause huge traffic problems on the main roads. We had a fire recently in Windsor, how will the roads handle the traffic? We just came through a severe water shortage, so where will more water come from? Please help the Koi Nation find a more creative way to make more money.

THIS IS DEFINITELY THE WRONG PLACE FOR A CASINO, ESPECIALLY SUCH A LARGE ONE.

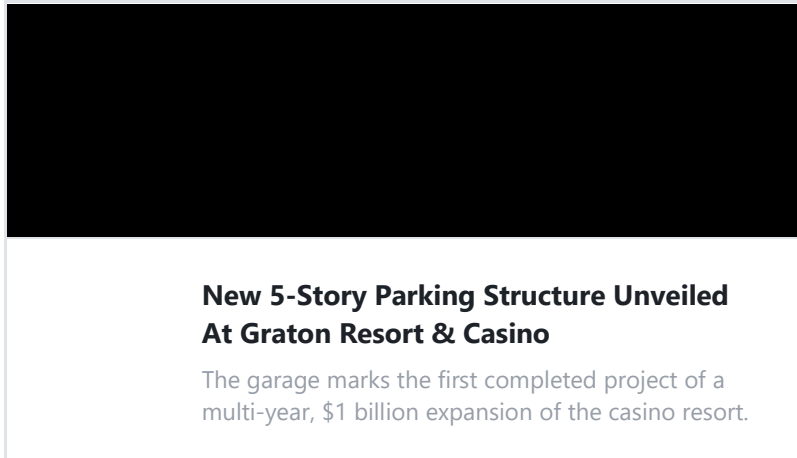
Thank you for your consideration,  
Vicki Walling  
Santa Rosa, CA

**From:** Carrie Marvin <caretoride@yahoo.com>  
**Sent:** Wednesday, August 14, 2024 7:01 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] THE KOI CASINO IN THE WINDSOR NEIGHBORHOOD

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Today I received a notification about an article on the new ADDITIONAL parking structure at the Graton Rancheria Casino just 15 minutes/miles south of Windsor. It is enormous and fits 1,600 cars. I cannot imagine any kind of a structure more than 3 (THREE) times as large as this structure in the Windsor neighborhood location. This is a monstrosity. Again, to think that 5,000 cars pouring out of this structure can safely happen when we have our next evacuation due to fires, is just unthinkable and impossible. The Bureau of Indian Affairs will be putting Sonoma County residents at significant risk during our next fire and evacuation. We are putting you on notice that this is a matter of life and death.

[New 5-Story Parking Structure Unveiled At Graton Resort & Casino](#)



I have tried over and over to impress that this is a huge problem and yet it doesn't seem like the BIA is understanding this.

[At Least 10 People Have Died in Cars That 'Were Overcome' by California Wildfires](#)

[Woman recalls harrowing scene of Maui fires as death toll climbs: 'People died in their car'](#)



**Woman recalls harrowing scene of Maui fires as death toll climbs: 'Peopl...**



**At Least 10 People Have Died in Cars That 'Were Overcome' by California ...**

The majority of these deaths occurred in the town of Paradise, which has been ravaged by Camp Fire

[Forced Out by Deadly Fires, Then Trapped in Traffic \(Published 2018\)](#)



**Forced Out by Deadly Fires, Then Trapped in Traffic (Published 2018)**

The infernos raging at both ends of California have created a double nightmare for residents. Many who fled fire...

People in Windsor took hours to get to the freeway. Same thing in Sebastopol. I left early during Tubbs and took back roads because the FREEWAY (the 101) was Closed

since the fire had jumped 6 lanes. It was absolutely terrifying. And the Kincaid fire I got an advance call that they were evacuating in an hour so I left - my car was already packed. Everyone else I know was stuck in traffic. My friends house up in the Shiloh estates - she stayed and was fighting the fire with her hose until the firefighters arrived. That is right above where the casino would be. Our house had massive smoke damage and we were out of our home for 2 months. You are not being realistic to think that adding 5,000 cars wouldn't cause a problem in our fire zone county. Face us residents in person. Let us tell you our fire stories. I have 30 friends who lost homes in the fires. They lost everything. Every single thing except their lives as they fled with seconds left. They lost pets and generations of personal items, cars and jewelry. This is absolutely irresponsible for the BIA and the KOI who are non-native to our town and our community.

Carrie Marvin  
Town of Windsor

**From:** Dee Camp <kathaeryne@yahoo.com>  
**Sent:** Wednesday, August 14, 2024 10:16 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

Sent from my iPad

Dear Mr. Broussard,

My husband and I are residents of Sonoma County and I am writing with regard to the proposed Koi Nation Resort and Casino Project. We are both strongly opposed to this effort, for two main reasons.

First, and I think most importantly, the land on which this development is proposed is not traditional Koi land. It is land within the area recognized as belonging historically to our neighbors, the tribes of Graton Rancheria. I would therefore think that the Koi have no claim to purchase land there, certainly without the permission and support of Graton Rancheria. And from what I have read they have no such permission and in fact Graton Rancheria is rightfully strongly opposed to this plan. If the Koi are allowed to proceed with this effort, then what is to prevent any tribe from encroaching on another tribe's territory? How does this impact the tribal integrity of ALL native people? If Graton Rancheria wanted to do something like this on Koi land I think you would find that the Koi would not be so pleased with that.

I understand that a casino/resort would provide potentially substantial income for the Koi. And I am certainly sensitive to the need for tribes to strengthen their financial positions. However, I don't think encroaching on another tribe's land AND doing so in a way that competes directly financially with that tribe's existing casino ( and so reduces money they have available to support THEIR community ) is a defensible approach.

In addition, the area in which the project is proposed is imminently unsuited for ~~this~~ this level of development. Much of the parcel is bounded by residential areas. The noise level associated with the increase in traffic will be quite substantial, as well as the general disruption in people's lives due to the increased traffic. Old Redwood Highway is basically a local road, not a four lane super highway for the kind of traffic this would produce. Could the road be widened? Yes, of course it could. But you would still have a problem with the fact that during fire evacuations getting to 101 is the fastest route out of danger in that area. And only Shiloh and Airport Boulevard access that. Think about adding several thousand casino guests and employees to the chaos and you have put a substantial number of people, including residential neighbors, at risk for their lives.

Finally, I cannot believe that the use of water by this establishment will be insignificant. Prices for water continue to increase in our area and in California overall. And water conservation continues to be extremely important. I would much rather that water be used for additional housing rather than for this. Let the Koi maximize the resources in their own area and homeland at Clear Lake.

I strongly urge that this project not be allowed to proceed. The Koi have no legal standing to do this and the area would not benefit from this project. In fact the opposite would be true. Those two factors should be sufficient to stop this effort.

Thank you.

**From:** Kathy Howard <kehoward61@gmail.com>  
**Sent:** Wednesday, August 14, 2024 10:21 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] Koi Nation Shiloh Resort and Casino

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Dear Mr Broussard,

We are writing you this email to express our opposition to the new casino planned by the Koi Nation for the Shiloh Resort and Casino.

We are Jack and Kathryn Howard and we live at 6181 Cottage Ridge Rd in Mayacama.

Having lived through the Tubbs fire and the evacuation that ensued during that time we feel like it would be difficult and dangerous to have to do an evacuation with a casino in our neighborhood. The roads simply could not accommodate a mass evacuation, they are already compromised with traffic now that new apartment structures have been built at Shiloh Road and Old Redwood Highway.

Another issue is the amount of water that will be used for a resort and casino this size. We already have restrictions and not enough water in our neighborhood during drought years. Putting out even small fires requires ample use of water not to mention all the new construction in our neighborhoods for housing and businesses depleting our water supply.

The Graton Resort and Casino is a mere 12 - 15 minute drive. That area has completely been transformed since the Casino was opened. We don't need that kind of transformation and I don't believe the Mayacama Golf Club will be able to survive in that kind of transformation. It will make living, golfing and dining there undesirable.

Last but not least the Koi Nation is not from the land where this casino is proposed. If a Nation can build on any land for a casino let it be the rightful tribe or nation and give them what is due to those decedents.

Sincerely,  
Kathryn and Jack Howard  
Sent from my iPhone

**From:** Jonathan Marvin <jpmarv@me.com>  
**Sent:** Wednesday, August 14, 2024 12:11 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] THE KOI CASINO IN THE WINDSOR NEIGHBORHOOD

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Mr. Broussard:

By way of introduction, I am a resident of Windsor and my wife has been a vocal advocate opposing the approval by the BIA of the proposed Casino by the Koi Tribe of the Pomo Indians in Windsor I am sure you are aware is most definitely not their tribal homeland - but I leave that to others to discuss. My wife and others who as Windsor residents (particularly those most affected on the east side of Highway 101) have spent hundreds of hours working to impress upon the BIA the dangers that would be presented by this project to those thousand upon thousands of residents in Windsor and northern Santa Rosa. I have finally had a chance to read some - but not all of the EIS - and I believe most of these potential impacts are raised and acknowledged to be true environmental impacts by the authors of the EIS. Originally my biggest concern about the EIS process was that the EIS was drafted by a company that apparently has significant past ties (and potential future business) with the Chickasaw Nation regarding that tribe's efforts to increase the number of Casinos across the country. And I still believe that the majority of impacts identified in the EIS have been classified by Acorn Engineering as not having Significant Impact, without much consideration given to the real life ramifications of the impacts on the community (as opposed to the impacts on the Casino site itself). But Ultimately, what is most significant is the final conclusion of the EIS as to the "Environmentally Preferable Alternative" project for the site under the Code of Federal Regulations (40 CFR 1502.14(f)). I am sure you fully understand this provision of the Code which requires the author of the EIS to make a recommendation based on comparison of the environmental impacts identified for the various alternatives. As set forth in the Code:

The alternatives section is the heart of the environmental impact statement. The alternatives section should identify the reasonably foreseeable environmental effects of the proposed action and the alternatives in comparative form based on the information and analysis presented in the sections on the affected environment ([§ 1502.15](#)) and the environmental consequences ([§ 1502.16](#)). In doing so, the analysis should sharply define the issues for the decision maker and the public and provide a clear basis for choice among options. In this section, agencies shall:

\*

\* \*

(f)

Identify the environmentally preferable alternative or alternatives amongst the alternatives considered in the environmental impact statement. The environmentally preferable alternative will best promote the national environmental policy expressed in section 101 of NEPA by maximizing environmental benefits, such as addressing climate change-related effects or disproportionate and adverse effects on communities with environmental justice concerns; protecting, preserving, or enhancing historic, cultural, Tribal, and natural resources, including rights of Tribal Nations that have been reserved through treaties, statutes, or Executive Orders; or causing the least damage to the biological and physical environment. The environmentally preferable alternative may be the proposed action, the no action alternative, or a reasonable alternative.

It is worth noting that there were only two “beneficial impacts” identified by the EIS, one being the Effects to the Tribe, which they note ["would allow the Tribe to generate revenues to fund tribal services."](#) There is no indication or evidence of what services the Koi nation provides to its fewer than 100 members. And the completely speculative Economy/Employment benefit to an amorphous community (in no way discussing how the affected location would benefit), in which ["construction and operation of the project alternatives could impact spending and labor demand in the region. Construction and operation of the project alternatives could impact wages, job availability, and/or employment rates."](#) Based on comments raised at the Zoom meeting, primarily by members of the Northern California Carpenters Union, presumably there would be some number of jobs for union members during construction (in those comments, none of those union members claimed to be residents of Windsor and only one identified his home as unincorporated Santa Rosa. And presumably there would be other jobs available but no indication of evidence that any of those jobs would be taken by Windsor or even Sonoma County residents where the biggest employment issue for many small businesses is finding people to fill job openings. Compare that with more than 80 negative impacts, whether deigned by Acorn Environmental to be Less than Significant (without other than speculative explanation) or Significant (with speculative analysis of the mitigation that could render them **potentially** less significant).

I urge you to take the recommendation of the EIS and find for Alternative D as identified by the EIS.

**From:** Dee Camp <kathaeryne@yahoo.com>  
**Sent:** Thursday, August 15, 2024 9:46 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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

Dear Mr. Broussard,

My husband and I are residents of Sonoma County and I am writing with regard to the proposed Koi Nation Resort and Casino Project. We are both strongly opposed to this effort, for two main reasons.

First, and I think most importantly, the land on which this development is proposed is not traditional Koi land. It is land within the area recognized as belonging historically to our neighbors, the tribes of Graton Rancheria. I would therefore think that the Koi have no claim to purchase land there, certainly without the permission and support of Graton Rancheria. And from what I have read they have no such permission and in fact Graton Rancheria is rightfully strongly opposed to this plan. If the Koi are allowed to proceed with this effort, then what is to prevent any tribe from encroaching on another tribe's territory? How does this impact the tribal integrity of ALL native people? If Graton Rancheria wanted to do something like this on Koi land I think you would find that the Koi would not be so pleased with that.

I understand that a casino/resort would provide potentially substantial income for the Koi. And I am certainly sensitive to the need for tribes to strengthen their financial positions. However, I don't think encroaching on another tribe's land AND doing so in a way that competes directly financially with that tribe's existing casino ( and so reduces money they have available to support THEIR community ) is a defensible approach.

In addition, the area in which the project is proposed is imminently unsuited for this level of development. Much of the parcel is bounded by residential areas. The noise level associated with the increase in traffic will be quite substantial, as well as the general disruption in people's lives due to the increased traffic. Old Redwood Highway is basically a local road, not a four lane super highway for the kind of traffic this would produce. Could the road be widened? Yes, of course it could. But you would still have a problem with the fact that during fire evacuations getting to 101 is the fastest route out of danger in that area. And only Shiloh and Airport Boulevard access that. Think about adding several thousand casino guests and employees to the chaos and you have put a substantial number of people at risk for their lives.

Finally, I cannot believe that the use of water by this establishment will be insignificant. Prices for water continue to increase in our area and in California overall. And water conservation continues to be extremely important. I would much rather that water be used for additional housing rather than for this. Let the Koi maximize the resources in their own area.

I strongly urge that this project not be allowed to proceed. The Koi have no legal standing to do this and the area would not benefit from this project. In fact the opposite would be true. Those two factors should be sufficient to stop this effort.

Thank you. Kathaeryne Dee Camp

**From:** Tamar Cohen <tamarmot@gmail.com>  
**Sent:** Thursday, August 15, 2024 3:14 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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Hi Mr. Broussard and BIA,

I attended the virtual meeting on the EIS but could not stay long enough to raise my comment. I am a resident of Windsor and have several deep concerns that I did not hear in the meeting.

1. The town of Windsor is a small (26,000 person) town, which is special in that it is a "regular" town with residents, instead of a primarily tourist area which is what a lot of towns in Sonoma county have turned into. Our residents consist of a lot of families, regular wage earners. We have our town green with twice weekly events all summer, farmer's markets, and so many other community building events at local parks and schools.

When guests come to the proposed casino, they would not just be coming to the casino itself but they would also come to visit the surrounding area. The sheer volume of guests would overwhelm our small town, removing access for residents to the community building events and displacing residents from being able to park and access our small number of amenities.

2. My second concern is due to the increase of environmental heat generated by removing upwards of 50% of the existing vineyard and soil, which of course combats global and local warming and helps with carbon sequestration by the plants. Buildings, parking lots and the multi story parking garage would radiate heat, increasing the heat in an already hot area which is very fire prone.

3. Lastly, I have concerns about the guests causing accidents or fires as they travel to and from the casino, passing by many residents walking their dogs, riding their bikes, or kids heading to or from the nearby parks.

Thank you for reading my concerns.  
Tamar Cohen  
6364 Starr Rd  
Windsor, CA 95492

**From:** Louie Ferrera <honeypie56@gmail.com>  
**Sent:** Thursday, August 15, 2024 3:38 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS comments, Koi nation Shiloh Resort and Casino

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

Dear Mr Broussard,

I've written today to express my vehement opposition to the Koi Nation's proposed casino in Windsor, California.

The location of this proposed casino is directly across the street from one of the most beautiful parks in Sonoma County, Shiloh Regional Park. Shiloh is a heavenly and tranquil 850 acres of forests, creeks and trails and a popular place for folks in my area to get away from it all. Building a casino across from Shiloh would be like putting a McDonalds up on top of Half Dome.

Despite the obvious defiling of a unique place in nature, I don't think that the Koi even have a legitimate claim to the land.

Please consider my comments.

regards,  
Louie Ferrera  
Santa Rosa, CA

**From:** Lesley Alexander <lellya@comcast.net>  
**Sent:** Thursday, August 15, 2024 6:27 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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We're writing yet another letter as to why we oppose building a casino on this property. Apart from the issues we have already brought up - traffic, noise, parking, where the water will come from, evacuation nightmare in the event of wild fires, the fact that

officials reached an agreement with the Lytton Band of Pomo Indians in 2015 to refrain from building a large planned casino on their sovereign land in north Windsor or anywhere else in the county.

Now we learn that the economically powerful Chickasaw Nation of Oklahoma is partnering with the Koi Nation to fund/build/mange this casino - not the small Koi Nation apparently consisting of a 90+ member tribe native to Lake County and not Sonoma County. Where will the profits go - Oklahoma? Who will fund upgrades to Shiloh Road and surrounding area - the taxpayers? Bait and switch?

We urger you not to approve this application for a casino.

Respectfully,

Lesley and Jerry Alexander  
Anna Drive, Windsor

August 15, 2024

PACIFIC REGIONAL OFFICE

2024 AUG 21 PM 1:16

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office BUREAU OF INDIAN AFFAIRS  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

**Subject: EIS Comments, Koi Nation Shiloh and Casino**

Dear Regional Director Dutschke,

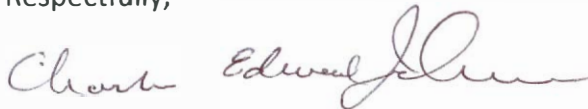
I am a Tribal Citizen of the Federated Indians of Graton Rancheria and former Cultural Monitor for the Tribe. The purpose of this letter is to express my personal opposition to the Koi Nation of Northern California's project to establish trust land for gaming in Sonoma County, California, more specifically on Shiloh Road in Windsor, California

As a previous Cultural Monitor and current member of the Sacred Sites Protection Committee for Federated Indians of Graton Rancheria I feel I have a somewhat unique personal view of the situation. I have monitored in this area, sometimes as a result of major fires that have decimated the area, of which fire is only one of many other major concerns. What concerns me the most is that Koi Nation claims this area as their ancestral territory. This is not their ancestral territory, their territory is in Lake County. Our tribe is notified when ancestral cultural items or human remains are found in our territory. Koi Nation is not on the notification list when there is a potential exposure involved in cultural sites in this area. I feel disrespected as a tribal member of the Federated Indians of Graton Rancheria that Koi Nation feels this is their territory. We as a tribe have even shared areas of monitoring with respect to other tribes when that is applicable, not here with Koi Nation.

The DOI is supposed to protect tribal sovereignty and this precedent setting proposal by the Koi Nation is actually undoing tribal sovereignty.

I support the right of all tribes to restore their homelands and pursue gaming on those lands. I do not have an issue with the Koi Nation locating a casino in Lake County, their ancestral territory.

Respectfully,



Charles Edward Johnson  
151 Petaluma Blvd. S. #309  
Petaluma, CA 94952

**From:** Mary Geldert <mary.geldert@me.com>

**Sent:** Friday, August 16, 2024 7:12 AM

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

**Subject:** [EXTERNAL] Subject line: EIS Comments, Koi Nation Shiloh Resort and Casino

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Email Body:

Dear Regional Director Dutschke,

I'm writing as a resident of Sonoma County to oppose the Koi Nation's proposed hotel and casino project near Windsor. The draft environmental impact statement (DEIS) is excessively technical and fails to address critical concerns like water supply, wildfire risks, and cultural resources. I am worried that the Bureau of Indian Affairs is rushing this process without ensuring the proposed mitigations will be enforced.

This project is not right for Sonoma County. The best option is the "no project" alternative in the DEIS.

Sincerely,  
Mary Geldert  
1936 Sansone Drive  
Santa Rosa Ca  
95403  
707-484-0173

**From:** Emma Fitzpatrick <emmafitzpatrick3@icloud.com>  
**Sent:** Friday, August 16, 2024 9:48 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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Dear Regional Director Dutschke:

As a concerned Sonoma County resident, I must voice my opposition to the Koi Nation's proposed hotel and casino on unincorporated land near Windsor. The draft environmental impact statement (DEIS) released on July 8, 2024, is laden with technical jargon that makes it inaccessible to most citizens. More importantly, it does not adequately account for the significant impacts this development would impose on our community.

Both Sonoma County and the Town of Windsor have raised valid concerns about the project's potential effects on water supply, traffic, public safety, and wildfire risks. Additionally, local tribes have noted the cultural impact. The DEIS suggests mitigation strategies, but without any guarantee of implementation. I fear that the Bureau of Indian Affairs is moving too quickly without ensuring the local environment and community will be protected.

While we support indigenous tribes, this particular project is not appropriate for our area. The Bureau should adopt the "no project" alternative to prevent irreparable harm.

Sincerely,

Emma Fitzpatrick  
1211 Seghesio Way  
Windsor Ca  
95492

PACIFIC REGIONAL OFFICE

2024 AUG 21 PM 1:25

BUREAU OF INDIAN AFFAIRS

August 17, 2024

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825  
RE: DEIS Comments, Shiloh Resort and Casino Project

Dear Ms. Dutschke:

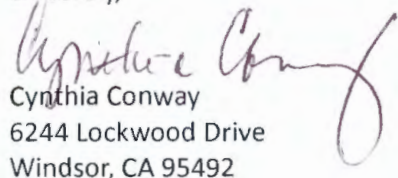
I am a 19-year resident of the town of Windsor and this is the third letter I have written voicing my adamant opposition to the proposed Koi Shiloh Resort project.

I have reviewed the Environmental Impact Statement to the best of my ability as I am not an expert in these areas and continue to have very grave concerns about this project in this location. The report indicates significant or potentially significant impacts in the areas of crime, project traffic, land use compatibility, law enforcement, evacuation impacts, surface water resources, ground water resources, socioeconomic conditions, transportation and noise along roadways. I would like to point out that there are several large apartment housing projects currently approved or under construction in the vicinity that were not taken into consideration in this report which will drastically affect many of these areas, the most concerning being evacuation impacts.

The proposed location is in a residential neighborhood with a housing development literally right across the street. It is right across the street from Esposti Park where our kids play baseball. Windsor is a family town and a casino absolutely does not belong here.

Please consider the safety and quality of life in our town and **approve Alternative D, no action.**

Sincerely,

  
Cynthia Conway  
6244 Lockwood Drive  
Windsor, CA 95492

**From:** Nina Cote <nina.cote@sbcglobal.net>  
**Sent:** Saturday, August 17, 2024 10:11 AM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Cc:** Nina Cote <nina.cote@sbcglobal.net>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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Dear Mr. Broussard,

I would like the embedded article to be made part of the EIS comments and official opposition to the proposed Koi Nation Shiloh Resort and Casino records.

[Public Statement on the Proposed Koi Nation Casino & Resort | NBLC](#)



Sincerely, Nina

Nina Cote'  
5828 Mathilde Drive, Windsor, CA 95492

**From:** marcia singer <marcia.lovearts@gmail.com>  
**Sent:** Saturday, August 17, 2024 3:35 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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Dear Mr. Broussard,

In ceremony and prayer this morning, I asked deeply for a way I might clearly beseech you, the Bureau, the KOI and their support team, *to abandon each of the three plans* to develop the unincorporated land adjacent to the Town Of Windsor. It is currently an immense vineyard (and vital wildfire breaker) situated in a wildish area of Sonoma Count. It's surrounded by homes, a neighborhood and Shiloh Regional Park. I live across the road, due west, in a modest mobile home park. The richness of my life, and value of my home, is intimately connected to the natural wildish environs. The natural terrain, a second Regional Park nearby, and a measure of tranquility is found here (even as more traffic and noise creep in, daily.)

***A hotel and casino gaming complex has no place here.*** You will receive letters from many who live in the area, stating **many reasons why** such an endeavor would be a devastation to life here: humans, non-human kin. Aside from the dangerous threats to wildfire evacuation, and traffic congestion interrupting every conceivable aspect of daily life –there would be the harm to and displacement of our four-legged and winged brothers and sisters. O mitakuye oyasin.

Let the hearts of my Native kin be fully opened. **May those of us who carry in our DNA the Memory of caring for our Mother Earth, of being Her stewards -- prevail.** This land is not meant to carry the weight and unceasing activity of casino and hotel enterprises. All we living beings dwelling in its midst would suffer from the unnatural use of the property, noise, pollution of the environs, water consumption. Devastation has heavy consequences, difficult karma.

Let the Spirit of the KOI and their Oklahoma backers, and those in seek of employment pray: KNOW that there IS a place that is PERFECT to suit your varied needs, that will profit your endeavors, make the land and your kindreds proud for generations to come. But first, this project must be released to Spirit.

This Windsor project is NOT that home.

Respectfully,

Marcia Witrogen  
630 Colonial Park Drive,  
Santa Rosa CA 95403

**From:** Julie Leveque <julsleveque@gmail.com>  
**Sent:** Saturday, August 17, 2024 3:47 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS comments Koi Nation Shiloh Resort and Casino

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Hello Chris,

My wife and I lost our home of 30 years in the Tubbs fire of 2017- we were one of 5000 homes lost in that conflagration.. Needless to say we are hypersensitive to the prospects of another such wildfire in our area. The Kincaide fire of 2019 was another major fire in the same area. Bringing thousands of vehicles onto the back roads around the casino area will certainly increase the risk of starting another major fire. Many of your patrons will be smokers and as a group smokers are not considered the most careful folks when it relates to caution with matches and cigarette butts. Ninety-five percent of all wildfires in the U.S. are human caused and a good portion of those are due to improper disposal of cigarette butts. Possibly you could mitigate the problem by admitting only non-smokers to your casino.

As a long time volunteer of Shiloh Regional Park, a park of 840 acres located immediately across Faught Road from the proposed Koi Casino, I am concerned about the negative impacts the casino will have on the park. Shiloh Regional Park is the only one of our 56 parks which does not allow dogs in the park. This restriction is because this park is located in a rather secluded section of the county and is intended to provide a sanctuary for wildlife. Many mammals including deer, bobcats, coyotes, racoon, skunks and a great variety of rodents and even an occasional mountain Lion have been observed in the park. As a bird watcher I am impressed with the variety of birds one can see in the park. Over a years time, I have personally observed 86 species of birds at the Shiloh Regional park. There is also a desire to provide hikers and others using the park a modicum of tranquility and respite. To that end locals have dedicated 56 benches and picnic tables at scenic or special areas for the enjoyment of visitors- each of these require a \$5000.00 donation to the parks foundation. A mega casino with a parking garage of 5000 spaces located immediately across the road from the park is hardly compatible with the intended purpose of this park. the increase traffic noises, the lights from the casino, the hotel and garage and the influx of many many folks will literally destroy the major attractions of this beautiful county park. There is no way you can mitigate these many negative impacts from this proposed casino.

Sincerely

Peter Leveque

--

Julie Leveque  
9163 Chalk Hill Road  
Healdsburg, Ca 95448  
707.838.4866

**From:** Julie Leveque <julsleveque@gmail.com>  
**Sent:** Saturday, August 17, 2024 3:51 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS Comments, Koi Nation Shiloh Resort and Casino

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Dear Chris,

The Koi proposed casino is located on a 2 lane county road and is accessible via 2 other narrow 2 lane county roads. With 5 bars in this casino it takes little imagination to see that we will have a number of drunk drivers on these narrow roads creating a danger to themselves and those in the neighborhood. this certainly is the wrong place for a casino unless the tribe mitigates these dangers by serving only non-alcoholic beverages- I thing this is most unlikely.

Sincerely,

Peter Leveque

--

Julie Leveque  
9163 Chalk Hill Road  
Healdsburg, Ca 95448  
707.838.4866

**From:** mike.cote@sbcglobal.net <mike.cote@sbcglobal.net>

**Sent:** Saturday, August 17, 2024 3:56 PM

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

**Subject:** [EXTERNAL] NOI Comments, Koi Nation Fee-to-Trust and Casino Project

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August 16, 2024

Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

**Subject: EIS Comments, Koi Nation Shiloh Resort and Casino**

Dear Regional Director Dutschke:

I am responding to the Draft Environmental Impact Statement that was prepared by the Bureau of Indian Affairs for the Koi Nation Shiloh Resort Casino Project in May 2024.

The DEIS uses the words “short term inconveniences”, short-term disturbances”, and “short term disruptions” to describe unmitigated impacts to my family’s and neighbors’ environment. Other ambiguous phrases like “not expected” and “not anticipated” are used to downplay the potential impacts. Who will monitor and regulate all of the mitigating factors described in the report? And who decides what “short-term” means? There has been non-stop construction within a half-mile of the proposed resort since ground breaking on the Esposti Park Apartments several years ago.

Despite the data collected within the DEIS, if the resort casino is approved to be built, traffic and roadway changes on Shiloh Road and Old Redwood Highway **will** become long-term and will continue to significantly impact lives of the community residents, businesses, schools, and churches.

At this moment, within one-half mile of the proposed resort casino, there is over 300 multi-family housing units under construction, a planned 175-unit senior living and memory care facility, and 32,000 square feet of commercial development underway or planned. Amidst this rapid growth, the lone remaining parcel of open greenbelt space where Old Redwood Highway and East Shiloh Road intersect is now the subject of the largest Resort Casino in California. While abrupt, this growth facilitates a socio-economic need for housing and fits within both the Town of Windsor’s and County of Sonoma’s general plans. Adding a resort casino does not fit. The Windsor plan encourages land use that facilitates walking and biking, while the county plan facilitates a greenbelt between Santa Rosa and Windsor so we don’t end up like San Jose. Funneling 30,000 cars per day to a resort in this neighborhood is a disregard to the community and its long term plans. The last two wildfire evacuations were unbearable. Adding resort casino traffic will put lives at risk.

As noted by virtually every local elected official, the location of the proposed resort casino is not appropriate and far outside the plans for this area irrespective of the poorly prepared DEIS.

**The only option I can support is Option D, no resort casino.**

Sincerely,

Michael Côté

5828 Mathilde Drive

Windsor, CA 95492

[mike.cote@sbcglobal.net](mailto:mike.cote@sbcglobal.net)

**From:** Julie Leveque <julsleveque@gmail.com>  
**Sent:** Saturday, August 17, 2024 3:56 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS comments Koi Nation Shiloh Resort and Casino

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Dear Chris,

There are two narrow two lane roads which provide access to the Koi Casino. On two of the roads are located public elementary schools. Mattie Washburn elementary school is located on Pleasant Ave and the other San Miguel is located on Faight Road. There is considerable congestion when parents drop their children off in the morning and when the children are picked up in the afternoon. Casino traffic will add a substantial danger to our elementary school children- this casino should be placed in another location - please do not proceed with this plan and endanger our small children.

Peter Leveque

--

Julie Leveque  
9163 Chalk Hill Road  
Healdsburg, Ca 95448  
707.838.4866

**From:** Julie Leveque <julsleveque@gmail.com>  
**Sent:** Saturday, August 17, 2024 4:03 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS comments, Koi Nation Shiloh Resort and Casino

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Hi Chris,

I have been living on Chalk Hill Rd for over 25 years. The Tubbs fire was close to our location- as it burnt the Shiloh Regional Park. The Kincaide fire burnt part of our property and other houses around us burnt to the ground. The difficulty of this fire was the narrow roads making it difficult for fire crews to be effective, as well as evacuation success. Adding a large casino into the region is going to impact this already fire prone area. Please consider this as you move forward with the decision, you will not only be affecting the people that already live here, the wildlife that call the Shiloh park their home, but also putting your casino at risk of getting burnt. And good luck getting insurance...

Julie Leveque

--

Julie Leveque  
9163 Chalk Hill Road  
Healdsburg, Ca 95448  
707.838.4866

**From:** Janet Stapleton <vanilla366@sbcglobal.net>  
**Sent:** Saturday, August 17, 2024 6:49 PM  
**To:** Broussard, Chad N <Chad.Broussard@bia.gov>  
**Subject:** [EXTERNAL] EIS comments, KOI Nation , Shiloh resort, and casino— Janet Stapleton 366 Firelight Dr. Santa Rosa CA 95403

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

I am against voting for any of the proposals for this project. I agree with all the issues that have been presented against this project. So I would like to concentrate on one additional issue not completely addressed. There is an elementary school San Miguel elementary school, which is situated on Faught Road, which is one of the access roads to the casino. I think I remember this school be being built in the 1960s. It is in the middle of the Wikiup neighborhood where I live. There would be additional traffic with drinking drivers on the road passing the school during school hours. My children who are adults now attended this school and now my two grandchildren attend this school. I know how the neighborhood is situated with part of the neighborhood on one side other school and an additional part of the neighborhood on the other side of the school. When the children are old enough to ride their bikes by themselves, they cross Faught Road to visit their friends all the time. My grandchildren have recently started to do this. This has been going on for years. The people who have bought houses here have purchased their house with no thought that there would ever be a casino in their backyard to worry about. I can't even tell you how concerning this is to me for the future kids who would be attending this school. Please take this issue in addition to all the other issues into consideration with a vote against these proposals. Thank you.  
Sent from my iPhone