

# STC101

## Stop the Casino 101 Coalition

*Representing the People of Marin County & Sonoma County, California*

www.stopthecasino101.com

January 17, 2006

Mr. Brad Mehaffy  
NEPA Compliance Officer  
National Indian Gaming Commission  
1441 L Street NW, 9th Floor  
Washington, DC 20005

re: **Emergency Supplemental Information-DEIS,  
Graton Rancheria Casino/Resort Project,  
Weather Emergency Event Impacts upon Project Site**

Dear Mr. Mehaffy:

This letter shall serve to confirm documentation previously submitted during the Scoping period that referenced and documented significant floodplain and water runoff issues at the project site, and the fact that recent weather events of December 30 to December 31, 2005, *verify* all previous documentation submitted, and indeed, indicate that concerns are even more serious than initially believed.

The recent weather event that produced wide-spread flooding throughout Sonoma County is not an anomaly: significant rain events have occurred in this area with similar or worse effects than that of the New Year's Eve event. In fact, the project site suffered similar events in 1982-83, 1986, 1993, 1995-96, and 1997. Indeed, according to Brenda Adelman, Acting Director of the Russian River Watershed Protection Committee, this last event of December 30 to December 31, 2005, had "less rainfall, but produced more flooding" than previous, significant events. Suspected reasons for this are increased development, especially on flood plains, and ground subsidence due to over-pumping of the aquifer there. (The casino footprint site is located over a cone of depression in this same aquifer).

The project site, including the footprint site, was under one to four feet of water across the entire 235 acres that extend from Labath Avenue to Stony Point Road. The Parson's study (included), prepared for the City of Rohnert Park on the NorthWest Specific Plan, and other sources have clearly identified the project's footprint site as "wetlands, flood plains, recharge zones, riparian areas, open space, and native habitats". Furthermore, proposed "fixes", including engineered channels, are in direct conflict with State of California public policy pertaining to riparian conservation, as is development on the flood plain of Rohnert Park's creeks' confluence, which is located on the casino site. Such "fixes" would only jeopardize the communities upstream and downstream by increasing the rate of flow of flood waters and by eliminating Nature's "fix", the flood plain.

The Tribe's plans to build a two to ten acre sewage treatment plant on that portion of the property (currently zoned as Community Separator) only a few hundred yards away from poses the same risk for flooding of that plant as was seen at the Llano Road Sewage Treatment plant on New Year's Eve (see included memo from the Santa Rosa Board of Public Utilities dated January 1, 2005 included). Neither will the tribe's alternate plan to hook up to Rohnert Park's system work: Rohnert Park's City Engineer has already stated publicly that the City lacks the capacity.

In fact, Rohnert Park, is already struggling to find somewhere to put the effluent created by years of changes to the City's General Plan that have resulted in more development than the local sewage facilities can handle. ( See included news article "*Santa Rosa weighs mandatory effluent in irrigation*", the Press Democrat, January 14, 2006) Adding another 'city' of 15,000+ patrons and employees per day to the region's already overburdened resources and facilities would place an undue burden on local government and residents, and create an untenable situation that would pose a threat to public health and safety.

The project is, in light of the recent weather event as well as the site's historical flooding and the local situation with regard to disposal of sewage effluent and solids, is certainly "fatally flawed". In fact, the project is fatally flawed in no fewer than five significant areas. In fairness to the applicant and investors, it would seem appropriate that the DEIS project be suspended for lack of an environmentally sound and appropriate site, and that the applicant should be encouraged to select an alternative site other than those previously identified by the tribe in the October 19, 2005, Scoping Hearing that are located on or adjacent to, the current project site. In the absence of the applicant's selection of an alternative site, the BIA should suspend the project and process now, to avoid future costs to the applicant, and future risks of liability and harm to Sonoma County residents, and the expected, resultant litigation.

I look forward to your prompt response. Should you have any questions, please feel free to contact me. My personal contact information is shown below.

Very truly yours,

Reverend Chip Worthington  
Pastor, Rohnert Park Assembly of God Church

CW/mtm

cc: Ms. Andrea Hoch, Office of the Governor

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enclosures