



SIERRA
CLUB

FOUNDED 1892

SONOMA GROUP

P.O. Box 466, Santa Rosa, CA 95402-0466
(707) 744-7651 Fax: (707) 544-9861

Brad Mehaffy, NEPA Compliance Officer
National Indian Gaming Commission
1441 L Street, N.W, Suite 9100
Washington, D. C. 20005

June 2, 2007

Re: DEIS Public Comments, Graton Rancheria Hotel and Casino Resort Project

Dear Mr. Mehaffy;

The Sonoma Group of the Sierra Club is very concerned about the environmental impacts of the proposed Casino Resort Project. The probable negative effects of this huge development on local air and water pollution, overdraft of the underlying aquifer, traffic and endangered wildlife are significant and can't be mitigated. We have many comments and questions, but the following are of the utmost importance and have not been answered by the Draft Environmental Impact Statement:

Groundwater Supply: Evidence from wells in the area around Rohnert Park indicates that groundwater levels are dropping. The most recent professional study of groundwater in the area has been deemed faulty by the courts. The DEIS must point out that new data is necessary to make accurate predictions of the effects of Casino groundwater pumping and the major impact the Project may have on groundwater levels. California legislation SB 610 requires that new projects verify an adequate water supply, but even a background inventory of groundwater supplies for the Rohnert Park area hasn't yet been made. The impact of the large amount of water that the Casino Resort will need to pump from onsite wells cannot have been adequately addressed by the DEIS, since important studies have not been done.

Increase of Pollution in the Aquifer: Appendix Y of the DEIS discusses MTBE gas leaks that have been found at three gas stations near the sites proposed for wells that will supply water to the Casino. The DEIS does not adequately analyze the question of how pumping on the aquifer will affect the MTBE pollution plumes - whether pumping could cause the plumes to move further into the groundwater supply. Could Casino activities also cause this pollution to migrate into the Laguna and then into surface waters?

Water Pollution in the Laguna de Santa Rosa: The Wilfrid and Stony Point sites proposed for the Casino are in a sensitive location for both ground and surface water. Drainage from these properties is into the Laguna de Santa Rosa, which is already the most polluted water body in the county. Sediment from fill and construction activities, treated wastewater, parking lot pollution, and landscaping chemicals will drain into the Laguna and from there into the Russian River.

The recently adopted Laguna de Santa Rosa Restoration Management Plan calls for no fill within the 100-year flood plain in which the proposed Wilfrid Ave. site is located, yet the plan for this site is that a large part of it will be filled to raise it above the flood plain. Artificial drainage systems will change the hydrology of the Rohnert Park sites, even in the areas that are meant to stay in a 'natural' state. This will surely degrade the on-site wetlands.

Air Pollution and Greenhouse Gas Emissions: The very large increase in vehicle trips associated with this Project – first in building the Casino and Resort and then with visitors, will create air pollution and greenhouse gas emissions. The Federal Government now recognizes global warming as a major problem, and the state of California is working actively to reduce greenhouse gas emissions. The huge, unavoidable increase in GHG emissions, traffic congestion, and air pollution from the Casino Project, a development which contributes to the well-being of only a small number of county residents, are a step in the wrong direction. Much more effort must and can be put into avoiding these emissions if this project is to go ahead.

Wetlands, Community Separators and Wildlife Habitat Destruction: After rapid population growth and development in the 1980's and 1990's, Sonoma County has made increasing efforts over the last decade to control land uses in the county in order to preserve the natural areas that are left. Conversion of land has been especially rapid in the Santa Rosa Plain, leaving only about 10% of the original wetlands and vernal pools.

Urban Growth Boundaries have been established around all of the cities in the Plain, the County General Plan has designated community separators to protect some of the last undeveloped areas between cities and development is now discouraged from occurring in flood plains. Casino Project Alternatives are all on sites that would have been protected from development for one or more of these reasons. The proposed Lakeville site is even less suited for an urban-style development than the Rohnert Park sites, since it is in a rural, scenic area, and presently is agricultural and wetlands.

The County and Cities are now developing an endangered species recovery plan for the California Tiger Salamander and four endangered plant species which will conserve the last areas of vernal pools in the Plain. The Wilfrid and Stony Point Casino Project sites, although not within a California Tiger Salamander Conservation Area, are in the corridor between two of them. This is a buffer zone intended by the U.S. Fish & Wildlife Service to have no major change in use. It is very important for the success of this recovery plan that habitat be as unfragmented as possible – and the most injurious land use for CTS is urban development.

We sincerely hope that the final EIS will address these issues and conduct all the necessary studies and related tests. It should then become apparent that the proposed Casino Resort has too great an environmental impact to be suitable for any of the proposed sites.

Thank you for this opportunity to comment.

Sincerely,

Jana Selph
Chair, Sonoma Group of the Sierra Club