



Councilmember Eric Guerra

August 21, 2024

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

Re: Environmental Assessment for Scotts Valley Casino and Tribal Housing Project

Dear Mr. Broussard,

As the California Air Resources Board (CARB) member representing the Sacramento Valley Air Basin, which includes Yolo and Solano counties, I am writing to share concerns about the Environmental Assessment (EA) prepared for the Scotts Valley Casino and Tribal Housing Project (Project).

This significant project consists of a 600,000 square-foot facility adjacent to a major freeway. The size, scope, and location of the project seems to necessitate a comprehensive Environmental Impact Statement (EIS) rather than a brief EA. Additionally, much of the Sacramento Valley Air Basin is a federal non-attainment area, which should necessitate more rigorous environmental review.

The proposed project site appears to consist of four parcels near a freeway interchange, but the EA does not appear to disclose any proposed land use for the three parcels closest to public roadways – particularly since a large mixed-use project has been proposed for those same parcels. Additionally, there is little information on potential air quality impacts. A development of this size and earthwork would likely generate substantially greater emissions than what is represented in the EA. Emissions estimates for the Project should be revisited to ensure they accurately address all construction and operational activities.

It does not appear that the EA was subject to a thorough scoping process. Before project implementation, there should be greater public participation and engagement to ensure the impacts on communities and the surrounding environment are taken into consideration. We must give ample opportunity for public input to factor in concerns throughout the analysis. Moreover, its release seems to have coincided with a holiday weekend, with little or no advance notice to local governments, Native American tribes, or interested members of the affected community.

Lastly, the City of Vallejo contains environmental justice areas which may be particularly vulnerable to air quality impacts, furthering the need for meaningful public participation. Since CARB has ambitious plans to meet GHG targets set out in state law, it requires rigorous analysis and meaningful public consideration.

Thank you for your time and consideration of this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Guerra", with a stylized flourish extending to the right.

Eric Guerra
California Air Resources Boardmember
Councilmember, District 6