



21 August 2024

Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825
Via: chad.broussard@bia.gov

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

Dear Mr. Broussard:

I write on behalf of Tuleyome, a non-profit conservation organization, to share several concerns about the Environmental Assessment (“EA”) prepared for the Scotts Valley Casino and Tribal Housing Project (“Project”) and to request that a full Environmental Impact Statement (EIS) be prepared in an open and transparent process.

Tuleyome engages in advocacy and active stewardship with diverse communities to conserve, enhance, restore, and enjoy lands in Northern California. Without meaningful public participation, rigorous environmental analysis, and transparent decision-making processes, our work would not be possible.

A development of the size and impact being proposed here, on a site of this sensitivity, demands a comprehensive Environmental Impact Statement that carefully evaluates the Project, *as well as* a full range of alternatives.

The size, scope, and location of the Project seem to demand a comprehensive Environmental Impact Statement (“EIS”) rather than a brief EA. A 600,000 square-foot casino adjacent to a major freeway is a significant project by any reasonable definition, and it should be subject to rigorous environmental review.

In addition, the proposed Project site is currently set aside as open space, and is home to a variety of endangered species and sensitive habitats. The Project’s 600,000 square-foot casino would irreparably alter these habitats and the wetlands they contain, “taking” endangered species in the process. However, it does not appear the Bureau of Indian Affairs has seriously considered any alternative locations.

The proposed project site appears to consist of four parcels near the Automall Parkway / Interstate-80 / State Route 37 interchange. However, the EA does not appear to disclose any proposed land use for the three parcels closest to these public roadways – despite the fact that a large mixed-use project has been proposed for those same parcels. If that development (or any other) is reasonably foreseeable, the impacts must be addressed in this EA or, preferably, in an

EIS.

We also understand there have been significant concerns expressed about the analysis of air quality impacts and the short time available to review it. A development of this size, with this much earthwork, normally generates substantially greater emissions than those represented in the EA. The California Air Resources Board has ambitious plans to meet GHG targets set out in SB32 and meeting these targets requires rigorous analysis and meaningful public consideration. The City of Vallejo contains environmental justice areas which may be particularly vulnerable to air quality impacts. Emissions estimates for the Project should be revisited to ensure they accurately account for all construction and operational activities.

I also encourage you to emphasize transparency, public notice, engagement, and participation. Environmental review processes like these are essential to ensuring impacts on communities and the environment are identified, disclosed, and mitigated before project implementation. Key to these assessments is giving ample opportunity for public input and factoring expressed concerns into continued analysis. This Project is large and controversial, but the EA does not appear to have been subject to any scoping process. 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.

A project of this size and scope has the potential to fundamentally impact the community and its environment, and great care must be taken to ensure that interested parties have a meaningful opportunity to participate. We urge you to prepare a full EIS for this expansive and significant project.

Sincerely,

A handwritten signature in blue ink that reads "Sandra Schubert". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Sandra Schubert
Executive Director