



California Oak Foundation
Friends of the River
High Sierra Rural Alliance
Jumping Frog Research Institute
Planning and Conservation League
Sierra Nevada Alliance
South Yuba River Citizens League

Honorable Governor Arnold Schwarzenegger
Governor's Office, State Capitol
Sacramento, CA 95814

Chairwoman Mary Nichols
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

July 18, 2007

Re: Climate Change Analysis Needed for Rural Indian Casino Projects

Dear Governor Schwarzenegger and Chairwoman Nichols:

The undersigned environmental organizations appreciate your role in helping California take the lead in the fight against global warming. We urge you to carry the same principles to all areas of California environmental and land use policy, including the siting and approval of new Indian casinos.

This letter focuses solely on the environmental impacts of locating casinos in remote rural areas, specifically impacts to air quality and climate change. We are not writing to address the issue of Indian sovereignty or any of the other complex issues surrounding Indian gaming.

We are concerned by the lack of analysis of the climate change impacts that would result from locating Indian casinos far from urban centers. Requiring all patrons to drive from urban areas or travel on diesel-fueled buses adds to our state's generation of greenhouse gases and thwarts other efforts to stem global warming.

The proposed Buena Vista Casino in Amador County is a case in point. The proposed casino would be located more than 40 miles from urban centers and far from any transit or rail lines. Further, it would not include any overnight lodging, which will result in increased daily traffic to and from the project.

Despite these obvious problems, the Tribal EIR for the proposal includes *no* analysis of global warming impacts. Analysis of these impacts is clearly required to comply with CEQA and to help achieve the objectives of AB 32.

Furthermore, the Tribal EIR notes that the project will result in significant and unavoidable "generation of significant levels of ROG, NO_x, CO₂, and PM₁₀" Traffic-generated CO on weekdays (111 tons per year in 2008) will be more than double the Amador County Air Pollution Control District threshold of significance on weekdays (50 tons per year). On weekends, traffic-generated CO (167 tons per year in 2008) will be more than triple the 50-ton threshold. According to the TEIR, the mitigation proposed would *not* reduce the resulting air quality impact to less-than-significant.

As the Planning and Conservation League noted in its letter to you on June 27, 2007:

CEQA is our single strongest environmental law, and it requires, as a general principle, that an environmental impact review be carried out when *any* proposed governmental action might have a significant negative impact on the environment. It also requires that feasible mitigation measures be implemented when negative impacts are identified. We know that continued emissions of greenhouse gases into the atmosphere will almost certainly have a negative impact on existing water supplies, agriculture, wildlife and wildlife habitat, our forests, public health, and the California economy. AB 32 acknowledges this in its initial findings and declarations:

Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California

Global warming will have detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry. It will also increase the strain on electricity supplies necessary to meet the demand for summer air-conditioning in the hottest parts of the state.

The California Environmental Quality Act requires governmental agencies to consider what can be done to *eliminate or reduce the impacts* of projects that might otherwise make global warming worse, and it calls for *feasible mitigation measures*. (emphasis added)

New Indian casinos should not be approved without complete mitigation of their environmental impacts, including impacts on global warming. Casinos should be held to the same environmental standards as all other major California development proposals. The air we breathe and the climate our children will inherit depend on consistent application of our state's environmental standards.

We urge you seriously to consider this issue as you review current and future casino proposals, and to do what you can to ensure that these projects don't make it even more difficult than it already is to meet our goals to reduce greenhouse gas emissions.

Sincerely,

Chris Wright
Executive Director, Foothill Conservancy

Co-signers

California Oak Foundation
Oakland
Janet Santos Cobb, President

Planning and Conservation League
Sacramento
Gary A. Patton, Executive Director

High Sierra Rural Alliance
Sierra City
Stevee Durkee, Project Manager

Sierra Nevada Alliance
S. Lake Tahoe
Joan Clayburgh, Executive Director

Friends of the River
Sacramento
Steven L. Evans, Conservation Director

South Yuba River Citizens League
Nevada City
Jason Rainey, Executive Director

Jumping Frog Research Institute
Angels Camp
Robert Stack, Ph.D., Executive Director

Cc: County of Amador
Friends of Amador County
Buena Vista Band of Me-Wuk Indians