

Citizens for a Better Way

**15 Pleasant Grove Road
Wheatland, California 95692**

September 3, 2010

Mr. Dale Risling
Acting Regional Director
Bureau of Indian Affairs, Pacific Region
2800 Cottage Way
Sacramento, CA 95825

RE: Final Environmental Impact Statement for the Proposed Enterprise Rancheria Gaming Facility and Hotel Fee-to-Trust Acquisition project, Yuba County, California

Dear Mr. Reising:

Citizens for a Better Way has prepared this response to the Final Environmental Impact Statement. Several new exhibits are being presented herewith, to back up claims in past statements of ours that you have questioned. For identification purposes they are alphabetically labeled.. All exhibits referenced that have been given to you in the past, and that are found within the FEIS, are numerically labeled. In order to reduce our carbon footprint, those will not be resubmitted, but should be easy for you to locate in the FEIS.

The FEIS Notice of Availability, prepared by the BIA, was filed in the Federal Register on August 6, 2010, but the FEIS Cover identifies May 9, 2009 as the date document was completed, one year and three months prior to making the document available to the public. Since the original EIS documents were begun, Yuba County and the nation have undergone severe economic stress. Many of the resultant stresses have changed the facts presented in the FEIS. Sleep Train Amphitheater, which is adjacent to the proposed casino, has attracted only five concerts this year, one-third as many as in 2000, the venue's inaugural season. It, too, hailed itself as a catalyst for revitalizing rural Yuba County. "It was probably not the best decision to build up there," said Gary Bongiovanni, editor of concert industry magazine Pollstar. "It's (on) a two-lane road, some distance from the metropolitan area." (*Sacramento Bee* newspaper, August 19, 2010. **(SEE EXHIBIT B, attached herewith.)**)

The indexes were quite confusing and most of the pages were not numbered. There were many duplications in the FEIS, conflicting facts given, and multi-naming of similar

issues made reading the FEIS volumes very difficult. We have done our best to place these issues in groupings that better consolidates information. Concerns are abundant that back-up information is not professionally provided in the FEIS. The maps and figures are in many instances quite unprofessional, some drawn by hand. Some reproduced to black, rendering them unreadable. Our group undertook our reading with a hard copies located at local libraries.

There were so many issues that needed comment that we found it extremely difficult to group them and respond to them in the short amount of time given. We would have liked to have given more input, but were constrained by the limited time for research. One of the areas of concern is that we did not have time to research the background of the consulting groups. The reason for this is that we observed so many inadequacies that the competency of the consultants was put into question.

We ask that you do not consider such random comments as the referral of a letter from Yuba County Supervisor Mary Jane Griego reading, "Additionally, Yuba County stated in a letter to the U. S. Department of the Interior, that the MOU more than adequately mitigates all anticipated impacts of the proposed development", with which statement the FEIS rendered mitigation "Less than Significant". ***Such an all-encompassing statement by an individual member of the County Board of Supervisors can hardly qualify as a scientific approach. Please see MOU comments.***

We note there is no discussion of the Federal policy questions regarding off-reservation land and that of tribal status..

There is no discussion on the Yuba County advisory vote, wherein the clear majority of Yuba County residents were opposed to a casino in Yuba County. Absent from the FEIS is discussion that the Yuba-Sutter Counties Farm Bureau have voted in opposition of a tribal casino in Yuba County, as has the Yuba County Board of Education, the City of Wheatland, both Wheatland Elementary and High School District Boards of Trustees and the opposition from the alliance churches and the Sheriff in Yuba County. Yuba County residents simply do not think a casino is a good fit. Since the casino would be placed in close proximity to Sutter County (4 miles to the south and to the west), we object to Sutter County being eliminated from the vast majority of study.

We have done our level best to provide accurate and pertinent information.

Sincerely,


Sandra Gilbert
Citizens for a Better Way

Enclosures: Exhibits A through F and comments

A. NEW FINDINGS OF CONCERN:

1. Measure R.

Measure R is contained within the FEIS exhibits as proof that a tribal casino would meet the zoning requirements if land were taken into trust for a tribal casino to be built at the proposed Yuba County Site.

It has come to the attention of this group that the "Sports and Entertainment" zoning designation (*Measure R, Yuba County Special Election, January 27, 1998 re Ordinance No. 1219, Yuba County Raceway Measure*) does not provide for "sovereign lands" to exist within the designated zone. Section 6 states "This measure shall be interpreted so as to be consistent with all federal and state laws, rules and regulations." ***Tribal sovereignty cannot be construed as providing consistency with all federal and state laws, rules and regulations. Tribe has not waived sovereignty to all state laws, rules and regulations (refer to State PL 280).***

Section 6 of Measure R also states, "If any section, sub-section, sentence, clause, phrase, part or portion of this measure is held to be invalid or unconstitutional by a final judgment of a court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this measure." ***No court decisions have been rendered.***

Section 7A of Measure R states, "This measure may be amended or repealed only by a majority of the voters voting in an election thereon....". Citizens for a Better Way submits that this issue has not gone before a court and that Measure R does not provide language necessary for acreage to be taken into trust for sovereign nation status. ***However, we do submit that the decision to place a tribal casino in Yuba County was placed before the Yuba County Electorate on November 8, 2005, and the county voters were not in favor of such tribal casino (see Attachment 2 in May 5, 2008 letter referring to April 9, 2008 Enterprise Rancheria Scoping Meeting in Marysville, CA).***

Section 7B of Measure R states, "The Yuba County Board of Supervisors may amend the General Plan or the Zoning Ordinance to change or delete the permitted uses set forth in this measure, if the Board makes the following findings and those findings are supported by substantial evidence:"....." Section 7B(2) "Construction work for the raceway or amphitheatre has not yet commenced." Section D2 is self evident. ***Citizens for a Better Way submit that the amphitheater has been up and running since 2000 (see Exhibit 1).***

As shown in the above language of the zoning measure, sovereign lands do not meet the zoning requirements of Measure R.

2. MOU between Yuba County and Enterprise Rancheria.

Numerous references to the MOU (full exhibit of the Memo of Understanding between the Yuba County Board of Supervisors and Enterprise Rancheria is in FEIS) are made in the FEIS. Citizens for a Better Way submits that the MOU is fatally flawed in that the above provisions of Measure R did not give authority to the Yuba County Board of Supervisors to enter into the MOU agreement which provided exemptions to Section 6. Section 6 requires full compliance with all state criminal and regulatory law (refer to California State PL 280). ***Yuba County Supervisors were not authorized to enter into a MOU agreement. FEIS is not in compliance with all State Laws.***

Furthermore the citizens of the Yuba County electorate on November 8, 2005 clearly demonstrated that they did not wish to have a tribal casino in Yuba County. (See details in our exhibits submitted for the April 9, 2008 Scoping Meeting in Marysville, California). Your attention is once again called to the fact that Yuba County Entertainment paid a reported \$529,515 in an attempt to obtain voter approval (see our Exhibit 2 from the April 9, 2008 scoping meeting in Marysville). ***The majority of the electorate in Yuba County are not in favor of a tribal casino.***

Citizens for a Better Way contest the authority of Enterprise Rancheria “representatives” to enter into an MOU agreement. Evidence has been presented to demonstrate that those members acting as spokespersons are in question as is their proposed “landless designation” that the “spokespeople” assert. (See exhibits). ***Response given in FEIS is not conclusive as to authority of Enterprise spokesmen involved in the solicitation of fee-to-trust status and the preparation of the FEIS. Court documentation of tribal leaders and “landless status” not evidenced in FEIS.***

This group wishes to object to the provision in the present MOU under Section 4. It states, “In return for the covenants of the Tribe as set forth above, the County agrees to support the Tribes application to have land taken into trust”.....This covenant essentially prevents the County from practicing it’s obligations to the citizens should a finding of fact not benefiting the citizens of the county come up at a later date.

B. Response to written comments included in the FEIS regarding May 5, 2008 letter from Citizens for a Better Way letter to John Reisick, Acting Regional Director, Department of the Interior, related to the Enterprise Rancheria Scoping Meeting in Marysville, California, April 9, 2008 is as follows:

Point One: Conclusive evidence has not been presented to suggest that the 40-mile Road site chosen for a casino is located within a tribal consolidation area, or that Enterprise Rancheria owns the land. Nor has conclusive evidence been presented that Enterprise Rancheria does not own land in Butte County. *Proposition 1 A did not foresee casinos on non-tribal lands.* Note that Enterprise tribal lands are located at a distance from the Yuba Site of more than 60 road miles (due to rural nature of many roads from tribal lands to Yuba Site, approximately 1 ½ hours are required to safely drive that distance). Travel from rancheria will preclude employment for most tribal members. The FEIS states as ones of its purposes that employment will exist for unemployed tribal members. *Site unacceptable, not within tribal consolidation area, travel time from rancheria land to Yuba Site is inconsistent with the purpose and intent of the Indian Reorganization Act. Not consistent with FEIS identified purposes of employment of tribal members.*

Point Two: Voters rejected the placement of a tribal casino in Yuba County on November 8, 2005.

Point Two: This group continues to hold concerns that “the Indian tribe will have the sole proprietary interest and responsibility for the conduct of any gaming activity”, as required by IGRA. *The “sole proprietary interest” requirement in IGRA’s noted regulations has not proven to be valid until Mr. Forsythe and his Yuba County Entertainment LLC’s benevolence has been shown to be more than self-serving. The intent of Congress has never been to create new reservations in order to create wealth for non-Indian governments and/or non-Indian gaming investors. Note that Mr. Forsythe seemingly controls Yuba County Entertainment LLC, and a total of 1,245.45 acres at the proposed site, including 40-plus acres set aside for a casino. (See Exhibits). Enterprise Rancheria would not hold “sole proprietary interest” to the land. Non-Indian gaming investors will be given the opportunity to profit handsomely.*

Point Three: *There exists no proof presented in the FEIS that the peoples of Enterprise Rancheria “have lived on the proposed site continuously and in commonality since time memorial”.* (See Exhibits in FEIS previously submitted)

Point Four: Strong objection is made to FEIS statement that the Governor's denial to Enterprise under Section 2 of the IGRA does not apply to the FEIS. *Enterprise Rancheria needs a State Compac before proceeding further to take land into trust.*

Point Five: Objection to validity and integrity of evidence presented in the FEIS regarding Citizens for a Better Way's allegation that the gaming market in this area is saturated. The argument presented by Enterprise is highly speculative and self serving. There are no valid statistics to back up claims that gambling addictions and their resultant socio-economic ramifications in our area are not already stressed due to proximity of other casinos. The areas of potential concern were not properly identified. This group's one-on-one visits with local (within the County of Yuba) churches, law enforcement, welfare agencies and citizens reflect a different conclusion. There is no evidence in the FEIS to confirm that the methodology used to form opinions in FEIS was accurate. *Gaming saturation study inadequate given methodology employed to evaluate existing conditions within any defined study area..*

Point Six: The traffic problems noted in our letter, and those within the entire area affected by the proposed casino, have not been addressed adequately. Traffic studies of such a magnitude demand a much higher level of attention to all traffic affected by the proposed casino, whether traffic is influenced 1 mile or 15 miles (or in other counties) from the proposed site. The scope of the studies presented in the FEIS have been limited to the point the studies are almost predominantly site specific. *Please note the attached map exhibit submitted with this letter (Exhibit A).* On that map, which highlights a 5-mile radius, one can observe that not only State Highways 65 and 70 will be impacted, but also rural roads to the south of the site (i.e. 40-Mile Road *in* its entirety), Dairy Road between 40-Mile Road and Highway 65 (including a blind intersection on that road when it crossed Oakley Lane. Pleasant Grove Road, which is the continuation of 40-Mile Road at the Yuba-Sutter County Lines and its numerous intersections such as Wheatland Road at the Yuba-Sutter County line, and many small, blind intersections in Sutter County until it reaches Howsley Road, which continues to State Highway 70. The mitigation areas along 40 Mile Road/Pleasant Grove Road, and all intersecting roads in both Yuba and Sutter County are deemed dangerous. The dangers include many blind intersections. There are significant flooding and fog issues along these roads. Shoulders are minimal. Small bridges, agricultural roads to properties are prolific, driveways to rural homes, sight limitations have not been addressed in FEIS. Since the small roads in these areas cross streams and agricultural lands there are many wild animal crossings, which include deer, cougar, turkeys, and small animals, reptiles and birds (note owls fly low on these roads at night in their pursuit of food). Wildlife not properly assessed in relationship to such increased road traffic. References comparing amphitheater traffic to casino traffic in the FEIS have not been shown to be other than highly speculative, and are not comparable in relationship to amount of traffic. (See Exhibit B). Air pollution and law enforcement concerns have been incompletely identified to satisfy health and safety mandates. Highway 65 impacts in the City of Wheatland have not shown to have been resolved in the FEIS. Speculative analysis of future road improvements contained is not backed up by evidence presented in the FEIS.

There is no indication of study of traffic violations, accidents and DUIs resulting from the use of roads by Amphitheater customers. Particularly, there is no study of DUI incidents on the smaller feeder roads to the south of the site, which appear to be utilized by those customers seeking avoidance of law officers.

Further there are no reports or studies given to indicate trespass violations (camping, loitering, drinking/drugs) by Amphitheater patrons south of the casino along the rural roads there and onto private properties along those routes, all the way to the Howsley Road intersection of SR 70.

Traffic studies highly inadequate in area and scope of study, omitting nearby rural areas, State highway routes, Yuba and Sutter County agricultural impact, safety concerns of increased travel on feeder roads to Yuba Site. Realistic mitigation measures omitted from FEIS documents.

Point Seven: The impact of a casino to the resident farming communities of both Yuba and Sutter Counties has not been addressed in the FEIS document. The Yuba/Sutter Farm Bureau has opposed the site for various reasons. ***The socio-economic study is incomplete and inaccurate.***

Point Eight: Wastewater treatment proposed for the site in the FEIS is compared to the Amphitheater. The proportions of waste are not comparable due to the duration of the ongoing needs of the proposed casino and the infrequency of amphitheater events (See Exhibit B). Therefore, all references and speculations contained in the FEIS to the contrary are inappropriate. Impervious liners under wastewater treatment ponds to prevent groundwater contamination are not addressed in the FEIS. ***Wastewater treatment presented in the FEIS is vague and inconclusive.***

Point Nine: ***Possible off-site drainage to Best Slough has not been properly addressed in the FEIS.***

Point 10: ***Socio-economic Assessment is speculative and woefully lacking in information.***

Point 11: Community objection confirmed by vote of people (see Point Two, above).

Point 12: Inconsistencies are prevalent in EIS statements. Please note photograph of Marysville Hotel (Exhibit C presented with his letter) to verify our claims in our letter that the Marysville Hotel has been boarded up and condemned for many years, and that the Amphitheater has been losing money and has been up for sale for many months (Exhibit B). ***Such misinformation has not been formally removed by virtue of the FEIS and should be viewed as an intentional attempt to confuse distant government agencies responsible for local decisions.***

B . Response to stated “Purposes of Casino”.

Our first response is to comment that evidence has been presented calling into question the authority of persons representing themselves as tribal leaders and we also question the methods in which the members have been identified/chosen. Until these issues are resolved in a courts of law, there exists no clear evidence that the Enterprise Rancheria meets the required qualifications to take land into trust for a casino.

Purpose number 1 states that Federal action resulting in “lost” tribal lands. There is no indication of this issue resolved in a court of law.

Purpose number 2 suggests employment for tribal members will result if a casino is built. This group counters that the distance from the existing reservation lands and the commute time would preclude almost all employment opportunities for the tribe.

Purpose number 3 suggests improvement for the socio-economic status of the “tribe” and would lead to a “strong tribal government”. We would counter that the “tribe” has not been sufficiently identified and call to your attention that there are legal disputes regarding tribal governances.

Purpose number 4 suggests tribal members will become economically self-sufficient if a casino is built. We wish to point out that the non-tribal participants leading the Yuba Site endorsement are set to benefit from the sovereignty designation of Enterprise’s proposed casino at the Yuba Site and wish to reiterate that it has never been the intent of Congress to create new reservations in order to create wealth for non-Indian governments and/or non-Indian gaming investors. Such investors should not be eligible to participate in tribal sovereignty. Note previous comments in this letter regarding distance from rancheria precluding employment opportunities for tribal members.

Purpose number 5 proposes to fund local government agencies, programs and services, but does not provide details that would confirm any amounts of

real valuation to these claims, nor does it properly identify if the community resource needs for the proposed casino in Yuba County would be adequately reimbursed for the outlay to the needs of the proposed casino. (see FEIS documents addressing roads, fire, waste, air, agriculture, gaming addictions, crime, schools, wildlife—FEIS is incomplete in it's analysis of community concerns and related remedies to burdens created by a casino in Yuba County).

Purpose number 6 suggests Enterprise will be allowed to make charitable donations and government donations. There is no detailed evidence of the amount of donations to be expected nor specific purposes for the donations. There is no evidence that the donations would not be used for political campaigns benefiting Enterprise at the expense of the citizens of Yuba County.

Purpose number 7 suggests a casino for Enterprise would “effectuate the Congressional purpose set out in the Indian Gaming Regulatory Act”. We have presented evidence in this letter that negates this claim.

Therefore we submit that the purposes proposed by Enterprise Rancheria spokespeople are largely invalid and inconclusive as presented in the FEIS.

C. RESPONSE TO “CONTROVERSY” IDENTIFIED IN FEIS:

Air Quality

Members of this group do not profess to be experts, but do contend that many of us have lived here long enough to be qualified as resident observers, steeped in observations that often fail attention from outside consultants. We are most concerned about the on-going traffic exhaust on the smaller roads and at all intersections where traffic has to come to a stop. Those concerns should be identified on a much larger scale than has been presented in the FEIS. On a smaller scale, we are concerned about the odors and fumes that would emit from the wastewater treatment area. *We wish to reiterate that the Amphitheater cannot be compared to the proposed casino, in all ways, and in particular, as to wastewater. The amounts of fumes generated would be much larger and of a much longer duration (everyday as compared to less than ten times a year).*

Wastewater Disposal/ Water Supply/Water Quality.

Section 4.3 Water Resources (since FEIS pages are not numbered, we can provide only this section number from Volume #1) does not contain sufficient definition as to where all run-off will be held, or drained. The “either/and”, “if possible” and “where feasible” approaches offered are not sufficient. This group firmly disputes the FEIS claim that the site receives 1,000 acre-feet yearly of natural groundwater recharge. Our group is composed of many individuals familiar with water districts and water levels and associated with the Yuba County Water Agency who estimate the yearly recharge from rainfall to be more in the neighborhood of 1 acre foot per acre. *We estimate that if 1,000 acre feet of groundwater was recharged at the site, there would be a 25 foot high column of water sitting on the site each year.* Recharge is facilitated by surface water deliveries in the area. Local wells are monitored as to recharge and groundwater levels beneath the surface. We do not propose to be capable of estimating casino water needs, but we are skeptical of all the statistics when such errors are evidenced in the FEIS. ***One thousand acre-feet recharge is disputed as preposterous! Entire WWTP engineering disputed.***

There was limited discussion in the FEIS of **aerosol** use for control of odors on and off-site but no detailed information exists in the document. ***More information is needed regarding proposed aerosol usage.***

The wastewater disposal site is plagued with problems. The spraying of affluent on fields of grass or hay as proposed on such a small acreage is not state-of-the-art wastewater management. Comparing total discharge with that of the nearby Amphitheater, which has scheduled 5 concerts this year...all in fair weather--to a casino which will generate waste 365 days a year through all sorts of weather patterns is completely suspect. There is no complete indication in the FEIS complete as to how the off-site affluent will be handled or monitored. Flooding conditions are not adequately addressed. The FEIS states that “emergency response plans for sludge disposal, domestic waste spill prevention, emergency response, containment and spill clean-up water products disposal plan, a run-off prevention plan, and a hazardous materials spill prevention, emergency response, containment and disposal plan” will be contained in a manual to be completed within 6 months of operation. ***A complete manual covering all applications for safe management of the wastewater system must be in place and functional before operation of WWTP.***

As to mitigation offered by the FEIS, it is stated that the”tribe should participate in discussions with agencies in the county regarding a regional solution to wastewater treatment at the request of the County”, the sentence is difficult to decipher. Does this mean the county has to request such action, is Enterprise bound by such a request, or does this mean the engineering study considers this action prudent? Another question arises regarding wastewater and Measure R, the zoning measure in question. In Chapter 12.i3. Section 4 of that measure, it is stated, “A water system for public use and a sewage treatment and disposal system shall be constructed in compliance with applicable

standards.” One would assume that means on-site construction of a state mandated facility. There was no discussion presented as to liners of the ponds or scientific assurances that leakage would not occur into groundwater. If the WWTP is annexed to casino property (taken into trust by Enterprise) in the future, are the safety measures identical to those that will be prescribed should the FEIS be accepted? ***Information presented in FEIS not conclusive.***

Mowing is specified as a measure to occur in fields for ground inspection, yet no regular intervals are specified for this task nor are there details as to inclement conditions that might preclude such mowing, especially when considering soil conditions needed for mowing may preclude regular ground monitoring. ***Soil inspection information incomplete.***

Figure 2-4 Grading and Drainage map crude, inaccurate and unacceptable for FEIS.

Regarding Solid Waste, in the FEIS “Operation A-1 Section” of solid waste management, the sentence “Waste discharge requirements (WDR’s) for sludge disposal at the expanded WWTP would be similar to the requirements for the existing plant. Thus, significant impacts from sludge disposal would not occur”. Once again, the comparison to the Amphitheater is insufficient. Weather conditions, alone, dictate more study, to say nothing of sludge amounts generated and the duration of sludge generation over 365 days a years as opposed to 5 days a year.

A state-of-the art plan and manual for wastewater management should be approved before a FEIS is approved.

The FEIS states that “currently a wastewater treatment and disposal facility exists on-site”.....”and would be expanded to accommodate wastewater from the proposed project” and that “wastewater affluent would be discharged to spray fields in summer and stored in the winter”. There is no indication of allowance made in the wastewater studies for heavy rainfall in the spring or fall, at which times this area experiences unpredictable weather events. ***The FEIS is simplistic and inadequate as to wastewater treatment.***

The FEIS states the hay crop will be “...harvested annually and re-established every 5-6 years”. There is no provision in the FEIS to provide information as to the length of time needed every five to six years for the soil preparation, seeding, and growth of grass to size that would be suitable to “strain” pollutants from the sprayed water. Nor does the analysis reflect mitigation during times fields were not suitable to the intended purpose of sanitizing the spray water. The FEIS gives no indication of how much replanting could be done at any one time and what impact that act would have on the remaining spray fields. ***Hay crop waste management measures not conclusive.***

We object as misleading and inclusive the implications in the FEIS that the City of Marysville, Linda County Water District or OPUD might be able to take wastewater. There exists no evidence this could be accomplished, nor weather it would be legal in light of the zoning ordinance.

The FEIS in section V-5 states "If impacts to waters of the US become unavoidable".....the only mitigation considers wetlands, not run-off to Best Slough, Plumas Lake, ditches, or sloughs. (Note: This statement appeared in the Potential Effects to Wildlife Section but our group considers this statement worthy of question regarding wastewater treatment issues.)

The solid waste management program for removal is not outlined as to when and in what volumes those events might occur. The drainage outlets are particularly puzzling as to where such sewage drained from them would be directed. ***More information must be presented.***

The FEIS WWTP consultant states, "only one disposal method was considered for each project alternative, which was a spray field with seasonal storage", but concluded that "It is recommended that the Tribe consider participating in discussions with agencies in the County regarding a regional solution to wastewater treatment." ***We further note that the FEIS consultants recommend a secondary treatment system "if the RWQCB chooses to impose stricter effluent quality requirements from the storage ponds.....then a secondary treatment system would be required" and the obvious conclusion is that the WWTP engineering is inconclusive.***

Environmental Effect

The FEIS states "soil conservation practices shall be completed during the fall or late winter to reduce erosion during spring runoff". The word "completed" suggests that actual work may occur at any time. This group notes that the wastewater treatment studies are not in concert with the environmental effect studies as to when run-off might be expected during the year.. We are concerned that fall and late winter run-off, or run-off any time between has not been considered in the environmental studies. ***FEIS is simplistic and inadequate as to environmental concerns impending. .***

In sub-section "T" the FEIS states "disturbed areas shall be stabilized as promptly as possible, especially on long or steep slopes". We note there are not any long and steep slopes identified at the Yuba Site. The phrase "as quickly as possible" is non definitive.

In subsection "U", the FEIS statement that water runoff will flow to "prepared drainage outlets" has not identified on-site, off-site or other outlets.

In subsection "X" the statement "All necessary permits and approvals shall be obtained, including a NPDES Phase II General Permit for Storm Water Discharges from Construction activities" leaves readers questioning what "necessary permits and approvals" will be required and under whose set of rules (see discussion regarding Measure R and the MOU; and also discussion of Point Four in our letter of May 5, 2008).

In subsection "Z", the statement "The parking lot shall be designed to allow storm water runoff to be directed to vegetative filter strips to help control sediment and to control non-point source pollution, where possible" does not give ample protection from storm water and pollution run-off. *Inadequate studies.*

Note Figure 3.1.2-1 is crude and shows casino approximately 2,500 feet from Morrison Road and in direct contradiction for Figure 2.4 which is also non-professional. *Validity of all maps presented in FEIS questionable.*

Operational Noise

Within the FEIS there appeared no mention except to the parking lot areas. Citizens for a Better Way assert that additional traffic noise along rural roads to the south and the other rural road connecting to them that would be utilized by customers has had no study, and that the noise effects from that traffic could significantly change the rural atmosphere.

Operation-Related Impacts

There is no clear definition of how the impacts should and have been measured as to NOx, ROG and PM10 emissions by proposed casino

Employment

Note lack of mention of distance to reservation land, which is covered in other sections of this letter, and the potential to preclude tribal employment..

Housing

FEIS concludes that there are "plenty of houses here....vacancy from 4.6% to 3.4%." Scope of study did not estimate number of people living in customer target area who are teetering on the edge of losing their homes, and who might be tipped over the edge by gambling losses should a casino be located closer. The validity of the housing survey is questioned as conditions in the housing market have changed dramatically since the FEIS was undertaken.

Social Effects of Additional Casinos in Area

The FEIS states “an additional casino....would not impact those people who are problem gamblers since they already have a number of conveniently located gaming venues and non-casino outlets to participate in gambling” and pledges \$60,000 per year to charitable organization(s) dedicated to the treatment and prevention of pathological gambling disorders in Yuba County.....and would “maintain a database of past criminal offenders and bar their presence from the property”. FEIS does not identify the make up of “past criminal offender” offences that would bar them from the casino, nor the legality of that procedure. The impact study presented was speculative and vague at best. Statistics of problem gamblers in this area are neither up-to-date, nor scientifically analyzed.

Yuba County Fiscal Effects.

Note no tax revenue for property not in compliance with State Laws, nor the zoning covering Yuba Site property.

There is not a complete study of Federal, State and County tax revenues to be generated and how those revenues might be prescribed and in what amounts. “Various” payment to Yuba County and the City of Marysville are speculative, especially in light of the dubious MOU with Yuba County.

Resource Use Patterns

Transportation and Circulation. Please refer to traffic issues listed earlier in this letter.

Land Use

(Please see Agriculture heading below. Those remarks should be combined) Study states that “Yuba County land use regulations would not apply to land taken into trust”,land “would differ from adjacent land uses, but consistent with zoning” and”would not physically disrupt neighboring land use,”.....nor.... prohibit access to neighboring parcels”.....”or otherwise significantly conflict with neighboring land uses”. Our group considers these statements preposterous and not consistent with land uses that do not “immediately neighbor” [a loose term that appears to mean only those within 60 feet from the property lines of the Yuba Site], but which are possibly greater impacted than those “immediate” neighbors. ***This is an explosive agricultural issue and one of great conflict in this area of ag predominance. See earlier comments.***

Public Health and Safety

Under Section A, the sentence.....”Most state and federal laws and ordinances pertaining to fair employment practices and the protection of the health and safety of employees and customers, would not be applicable to activities on the Yuba Site” does not fit within the Measure R zoning requirements. Further, there appears no burden of responsibility for excessive alcohol consumption and related driving and criminal offences to Enterprise Rancheria. There has been no study presented in the FEIS of potential problems related to excessive alcohol consumption at the site.

Mention [but no details of proof of service exists] is given in the FEIS, is made of utilization of the California Highway Patrol, the Yuba County Sheriff [note that the Yuba County Sheriff responded to the EIS that she was opposed to the placement of a casino in Yuba County due to limited resources], but no mention is made of Wheatland City impact.

Public Health and Safety should be paramount in the FEIS. No evidence presented that would indicate services available will be adequate.

Please refer to our above comments regarding the Wheatland Fire Authority District conflicts.

Water Supply.

This group wishes to dispute the preposterous claim by the EIS that there is 1,000 a/f of natural groundwater recharge at the casino site. This is impossible. The methods used to arrive at this figure are flawed. (See above.)

Water Quality

The FEIS sentence “The effect of run-off volumes resulting from the increase in impervious roadways would be minimal due to the limited extent of the improvements in comparison to the existing roadways”, is stated to back up the “Less than Significant” mitigation measures suggested. Can this be construed to remove obligation of Enterprise to monitor potentially hazardous run-off from their site? ***Where are the comparison statistics to which roadways and in what surface amounts?***

Drainage

Considering the potential that sediment ponds cannot be emptied on a regular basis

during inclement weather, there are no feasible considerations given in the FEIS to preclude flooding conditions. ***There is no evaluation of possibility of area flooding inundation compromise of the WWTP area ponds and spray fields proposed in the FEIS. Flooding of contaminated waters off site to Best Slough, as well as all water drainage possibilities should have been identified in FEIS.***

Objection is made to language in the EIS regarding “either/or” or, “if possible”, or “where feasible”, and, “if the land were to remain in fee”..

Agriculture

(See above “Land Use” remarks, and also references to our letter of May 5, 2008 [also above]. FEIS states, Given the inferior quality of the soils on the Yuba Site and generally along 40-Mile Road and the relatively small contribution to the total loss of farmlands in the County, Alternate A would not result in a significant contribution to cumulative agricultural impacts”. ***Exception is taken to this description.*** Please continue.

The FEIS concludes accordance to the statement, “According to the Natural Resources Conservation Service (NRCS), both the Yuba Site and the wastewater treatment area do not contain prime, important, or unique farmland”. Our group asserts that the area studied should not have been judged by NCSC standards as those standards are not able to predict productivity or cash value of crops produced thereon. Indeed, many a high profit rice crops have been produced on the same soil and in nearby (within ¼ mile) lands. If consulted, NRCS would have explained that the soil listings tell only a small portion of the story when determining productivity. ***Conclusion of soil capabilities contained in FEIS in error.***

The FEIS states under the section relating to Socio Economic Conditions that the proposed casino would “.....result in impacts to surrounding properties”. But did not assess the mitigation measures to be other than “Less Than Minimal”. There was not sufficient information to back up this determination. There was no consideration given ag harvest, soil preparation, farm management practices, or access and egress concerns to rural properties or any other ag concerns presented in this letter.

As for the possible need for increased shoulders or other road improvements, the FEIS concluded, “However, the amount of land required would be a narrow strip on the end of the property and should not affect the land use for the remaining property” and that the issue is “Less Than Significant”. Quite to the contrary, proper study of this issue would have shown one of the more major issues related to the Yuba Site. Prudent farm management involves extensive/expensive irrigation delivery systems, ag machinery turning space in orchards and fields, safe access and egress that is critically located in relationship to rural roadways. Several feet of road widening can be a prohibitive financial burden to farm entities. The area study should include off-site locations to the south as described above and below in this letter. ***Increased burden to ag as a result of possible road improvements not addressed in FEIS.***

Nowhere in the FEIS document exists scientific data concerning the importance of agriculture in the area of the casino or the surrounding area. Ongoing goals of Yuba County in the newly adopted Yuba County General Plan require “Preserve Of Rural Lifestyle” and the “Provide for long-term, vibrant local agricultural operations” (see Exhibit E with this letter). Leapfrog development contains many potential threats to agriculture. A meaningful FEIS should contain studies at 5-mile and 10-mile circumferences from the proposed site and take into consideration whether or not the Yuba Site would in any way break up ag activities in those areas. ***Importance of area agriculture inadequately considered in FEIS.***

Nowhere has the FEIS identified the depth of conflicts the proposed casino versus related area agricultural sustainability, encroachment, compatibility, economic issues, access issues, land values, related traffic issues, open space, wildlife habitat. As shown in the attached exhibit (Exhibit D, published by the University of California Agricultural Issues Center), California farmers constitute an essential part of the state economy. Farm production is closely linked to many other industries: the production of farm inputs, the processing of food and beverages, the textile industry, transportation and financial services. Including multiplier effects, California farm and closely related processing industries employ 7.3 percent of the state’s private sector labor force and account for 5.6 percent of the state labor income [INSERT. Statistics gathered by the Ag Issues Center show a much greater influence in Yuba and Sutter Counties than many other counties.] Every dollar of value added—labor and property income and indirect business taxes—in farming and agricultural related industries generates an additional \$1.27 in the state economy. For every 100 jobs in agriculture, including the food industry, there are 94 additional jobs created through the state. California is also large on a global scale. Depending on the method applied to measure the value of agriculture here and elsewhere., California ranks between 5th and 9th in the world, ahead of such countries as Canada, Mexico, Germany and Spain. ***Impact of proposed Yuba Site to Ag related jobs and economic influence not considered in FEIS.***

We include *The County of Yuba June 2009 Crop Report* (enclosed as Exhibit E). Note “the gross value of Yuba County’s agricultural production for 2009 reached a new high at \$198,182,000”..... and that “the contribution of agriculture to the economy of Yuba County is not totally reflected in the values contained in this report. Processing, transporting, marketing, and other services directly or indirectly tied to agriculture benefited appreciably”. Also included is *The County of Sutter 2009 Crop Report* (enclosed as Exhibit F), which reflects an even greater ag value to the area. Sutter County Agriculture is important to this study because Sutter County 4.1 miles from the site to the south, and includes highly productive ag land at that juncture.

When addressing traffic concerns on 40-Mile Road, it was difficult to ascertain if any study had been given to that road south of the Amphitheater as it related to farming activities. There was no defined area where the “proposed gas station” might be located, except on 40-Mile Road. In the FEIS only vague references were made to other roads in

the vicinity that would be impacted by the proposed casino. The 40-Mile Road/Pleasant Grove Road to the south of the project and the rural roads exiting and entering 40-Mile/Pleasant Grove Road would be especially sensitive to traffic generated by a casino. The 4-Way stop at 4 Corners and Pleasant Grove Road is particularly problematic. ***Mitigation of 40-Mile/Pleasant Grove Roads and connecting rural roads not adequate.***

If road improvements or widening were to occur, who would pay for the work not identified in the FEIS? Scopes of possible concerns and the related cost of those related remedies, the responsibility for paying for the remedies were not identified in the FEIS. Such concerns include noise abatement from increased traffic, replacement of dangerous driveways and farm irrigation management systems, safety issues to farm transport, vandalism, and rural crime were not addressed in the FEIS except as to the immediate site.

The FEIS states, "As urban growth development occurs within the region, cumulative effects to the County's agricultural resources may occur from conversion of agricultural lands to other uses". and further goes on to cite proposed development within the Plumas Lake Specific Plan Area and North Arboga Study Area but does not take into consideration other important ag areas to the south of the proposed project that do not have a strong relationship to those Arboga and Plumas Lake Sites. This is misleading and inaccurate as to the cumulative risk to area ag. ***Study needed.***

Agriculture, a considerable economic factor in the area of the proposed casino, is not adequately analyzed as to potential impact in the FEIS document. The area of study contained in the FEIS is much too small to provide meaningful input.

Traffic

(Please note "Traffic" response in our above-referenced letter of May 5, 2008). In addition we note in the "Expansion of Services" section of the FEIS the statement, "Improvements to area roadways would serve to mitigate the impacts of Alternate A on area roadway networks, not to increase capacity of roadways to accommodate future unplanned growth". ***No evidence of proper mitigation, nor details of any mitigation are offered in FEIS.***

In the "Resource Use Patterns Section" of the FEIS, concerns of intersection safety issues are said to be "resolved with the Algodon exchange", ".....No other specific cumulative intersection safety issues would result in the implementation of Alternate A". The Algodon Exchange is not completed and there is no accurate information as to when that might be completed. Again, we ask you to refer to the intersection concerns mentioned in the agriculture sections of this letter. How does this address traffic concerns on SR 65 in the City of Wheatland.

There is no detailed designated area or areas for road shoulder work and/or road improvements, nor are any specifications given as to amount of improvements, or permits required even though those mitigation measures are briefly mentioned in FEIS as “Less than Significant”.

Note Figure 1-1 map is not capable of reflecting details of city limits, “community” borders. Please see our Exhibit A which is a little better, but still does not show proximity Wheatland City limits (approximately 4.5 miles from site), Dairy Road (approximately 2.8 miles to the south), Dry Creek (approximately 3.7 miles to the south), Sutter County line (approximately 4.1 miles to the south). ***These are important traffic considerations and should be properly identified as such, with accurate mapping provided. Also Fire, Police, and Medical service providers should be mapped.***

Note Figure 1-2 Topographic Map is crude and does not indicate waterways.

Under Section 3.1.8, Transportation, the FEIS states, “40-Mile Road is currently a 4-lane rural road between SR 65 and Plumas Arboga Road” [note this is false and misleading in concept]. “The roadway begins at the SR 65 interchange as a southern continuation of Ostrom Road and continues south into Sutter County as Pleasant Grove Road. 40-Mile Road connects directly to Plumas Arboga Road via a large radius curve, with left-turn lanes to and from 40-Mile Road south of Plumas Arboga Road. Forty-Mile Road has two- to four-foot paved shoulders, and has a posted speed limit of 55 mph”. Some of this is true, but completely out of context, leading the reader to conclude that all of 40-Mile Road is improved to the south of the Amphitheater. That is not true. ***False and misleading statements in FEIS.***

Figure 3.1.8-1 does not give adequate details to denote true appearance of larger traffic concerns or to provide for analysis. We call to your attention need for study of the redesign of the intersection of 40-Mile and Plumas/Arboga Roads. ***Poor map, inadequate intersection design.***

The FEIS figure of an estimated 6% of traffic leaving the proposed casino does not have adequate back-up to support this conclusion.

No traffic management details regarding Sleep Train Amphitheater Traffic Control available in FEIS for comparisons to proposed casino traffic.

Note study used for SR 70 is out of date.

Waters of the U.S

“The USACE does not consider roadside ditches to be jurisdictional”.....a statement contained in the FEIS is problematical if contaminated waters or pollutants flow from the

site. Also Section T suggests wetlands....."shall be avoided, if possible". The interpretation of "if possible" is much too loose.

Law Enforcement, Fire and Medical Services

The conclusion stated in the FEIS that "In general, the casino would not cause a substantial increase in crime, however petty crime including vandalism, burglaries, purse snatching, pick pocketing....." could increase. Appears scope of study quite limited and biased. Does not take into consideration numbers of these expected "petty crimes" or proportionate individual criminal acts as they might add up in a burglary or the vandalism to a \$120,000 farm implement down the road. Nor does the FEIS detail expected DUI's and mitigation (besides not selling alcohol to those under 18). **No study of merit, nor mitigations have been presented in the FEIS to adequately cover law enforcement needs on and off the proposed site resulting from a casino at the Yuba Site.**

Quite obviously no agreements have been shown in the FEIS to cover fire protection with the Wheatland Fire District, under whose authority that protection now exists. There has been no indication that the Wheatland Fire Authority could manage such a large and complicated complex of considerable height. *Provisions have not been made to cover fire protection.*

Impacts on Schools

As previously submitted, the Yuba County Board of Education and both the Wheatland High School and Wheatland Elementary School have voted to oppose the placement of the casino in Yuba County because of potential threat to the parents and children in this area.

Environmental Effect

A sentence appears in this section of the FEIS, saying "soil conservation practices shall be completed during the fall or late winter to reduce erosion during spring runoff". This sentence is similar to many others in the document in that it is written without employment of scientific thought. This area receives heavy rains that can begin in the early fall, during the fall, during the winter and during the spring. Also, there is an objection to the random words in the EIS such as "completed" in the afore-mentioned sentence. If this is to be a legal document should not other dates, such as commencement and active working dates be delineated, rather than the word "*completed*".

Another FEIS sentence concluding “Less than Significant Mitigation” needed is, “Due to the degraded condition of the roadside areas, habitat quality is generally low and expansion of the existing facilities would not result in a significant effect to sensitive species”. *There is no table or scientific study presented in the EIS all sensitive areas, including off-site areas, that would be impacted due to the placement of the casino at the Yuba Site.*

Also mention is made that “disturbed areas shall be stabilized, as promptly as possible, especially on long or steep slopes”. It is hereby brought to your attention that there are indeed no steep slopes at the Yuba Site.

Specifically, we wish to make certain that *all* surface water runoff goes *only* to “prepared drainage outlets” on the site or to state-of-the-art wastewater treatment facilities on site, and note you did not completely specify on-site or off-site, or parking lot. What was stated was “The parking lot shall be designed to allow storm water runoff to be direct to vegetative filter strips to help control sediment and to control non-point source pollution, where possible”.

Odor Impacts

Please note that the sentence “There are no odor generators that might impact Alternate A and Alternate A itself would not contribute odors to the region. However, if not properly operated, the expanded wastewater treatment facilities could cause a nuisance to the nearby residents”. Note: This sentence is contradictive in nature, and the word “region” is not defined. Does this sentence apply to all of the Yuba Site alternates?

Biological Resources

“Potential impacts to the agriculture/cropland would be less than significant due to the relatively common and abundant nature of the agriculture/croplands habitat types in the region compared to the relatively small area (36+ acres) of anticipated disturbance. Agriculture and cropland habitat is relatively abundant on a local and regional scale and is not considered a sensitive resource due the disturbance levels and dominance on non-native species” is a particularly controversial conclusion drawn in the FEIS. There is not adequate study to support such a conclusion. While we would agree that agriculture acts as a host to many species of wildlife, those of us who are involved in agriculture would wish to have a specific scientific study relating to area agriculture, with a separate study dedicated to wildlife and biology.

There is no indication that studies have detailed the biological impact of the proposed casino at the Yuba County Site as to increased traffic on the riparian areas, ditches, small streams, sloughs and rivers along the smaller feeder roads to the south of the proposed

site. These roads, as outlined in the traffic section of our comments, run long distances through extremely sensitive areas of critical habitat and migration routes (i.e. deer, cougars, turkeys, etc.). Nor is there any indication that safety of casino customers using these routes might encounter in relation to colliding with a deer, cow, owl, etc., which in the past have caused many serious accidents to these roads under much less traffic.

We wish to mention that eagles (both golden and bald eagles) are often viewed within a mile south of the proposed Yuba Site. We note these were not identified in FEIS studies.

In conclusion, Citizens for a Better Way contend that information in the EIS documents is contrived to show only positive benefits for the placement of a casino in Yuba County, to the unacceptable expense of the local citizens, the City of Wheatland, the County of Sutter, local agriculture, local infrastructure (including roadways, fire department, schools, law enforcement) and the region's (from ½ mile to 10 miles or any increment between.

Water Resources

The FEIS concludes, "Adequate groundwater is available for small commercial development along 40-Mile Road". There is no mention of the recharge to make this possible that is provided by both South Sutter Water District and the Dry Creek Mutual Water Company which service areas around the proposed casino, and the dwindling groundwater supply before these two districts were implemented. *Study incomplete.*

Socio-Economic Effects

In Section A "Cumulative socio-economic effects could occur in the vicinity of the Yuba Site as a result of developments that effect the lifestyle and economic well being of residents. Impacts can be both detrimental and beneficial", and were deemed to be "Less Than Significant" by the FEIS. Since agriculture is the main industry in this area, that socio-economic area should have been scientifically analyzed in detail. (See Agriculture sections in this letter.)

Comparison of Alternatives

Please note there is no proof presented in the FEIS that the Yuba Site is within Enterprise Rancheria's "aboriginal territories". See our letter citing that Enterprise does not meet the "100 years of continuous habitation" requirement set forth.

Note that comparisons do not consider adequate identification and mitigation measures to concerns outlined in this letter.

Conclusion that the Yuba Site is preferential is flawed due to facts presented in this letter.

Please see above arguments denoting reservation is 1 ½ hours driving time to Yuba Site, precluding most tribal employment alternatives.

Regulatory Setting

Please note above references to Measure R Zoning irregularities and flawed MOU.

The FEIS states “Guidance documents presently governing growth and development within the County provide a framework for the regulatory setting of the affect environment. Yuba County General Plan and Zoning Ordinances comprise the relevant framework discussed herein. While these documents would not apply to lands taken into trust, impacts may occur in terms of a federal project’s relation to growth and development visions as described in these guidance documents”.

Development and Management Agreement

The FEIS states “Yuba County Entertainment will possibly not enter into agreement with tribe for Alternate B due to reduced size” begs our question, *“Has Enterprise Rancheria entered into the FEIS process in good faith regarding all the Alternative Sites, or are those alternate sites presented merely as a ruse”*. *What are the roles played by Yuba County Entertainment in the FEIS process?*

The statements that Enterprise Rancheria makes in the FEIS that they were “...Federally recognized as a Naïve American Tribe on April 20, 1915”.....and that “Fifty individuals are designated as historical members of the tribe”, and the statement “The Enterprise Rancheria considered as their traditional homeland the land within the Feather River watershed” are considered speculative due to the fact there are no court decisions rendered to on-going legal decisions before the courts system. That the Feather River watershed was identified by engineers then as it is today is a matter of controversy and there is no evidence presented to back this information. **No determinations of law on tribal membership or representations of areas of tribal lands have been determined and are currently being challenged before the courts.**

Socio-Economic Conditions and Environmental Justice

In giving the locations of tribal “members” and the labor force, the majority of the members live in Butte County (locations there are not specified in the FEIS. The other “members” whereabouts are not properly identified for purposes of FEIS conclusion. Please see previous comments relating to distance from reservation.

Statement is made that the “boundary of Sutter County is located approximately 5 miles to the west” is somewhat misleading. *Sutter County is located approximately 4.1 miles to the south also.*

Agriculture is not listed as an important industry in Yuba County and the omission is glaring. Please refer to Agriculture section of this letter.

That Yuba is a relatively poor county with high unemployment is true, however the possibility of an severely adverse affect as a result of a casino placed at the Yuba Site to the unemployed and poverty stricken of our area is not analyzed in the FEIS, nor is the relationship of Beale Air Force Base in Yuba County.

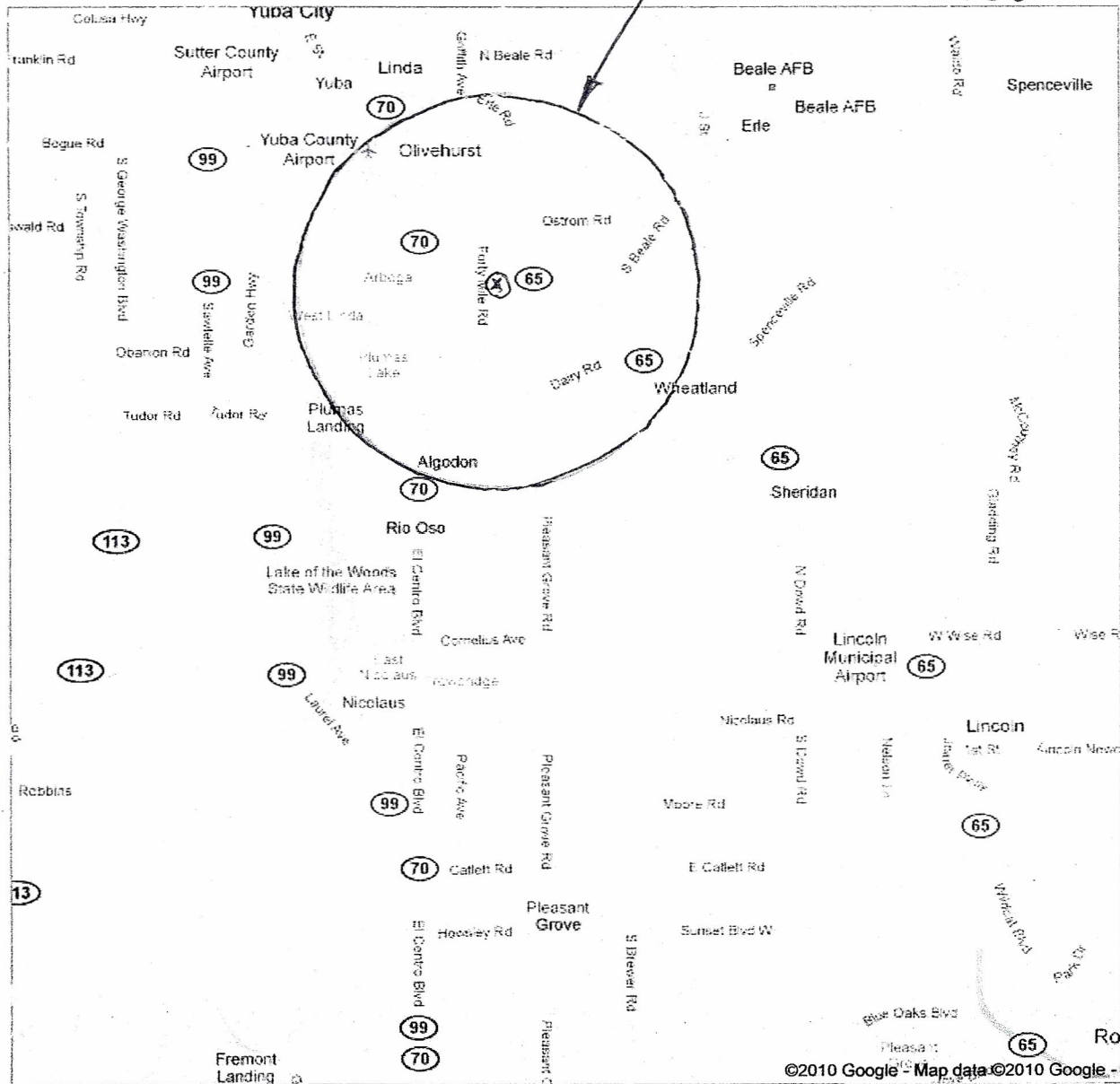
As for the “community” infrastructure, the FEIS elimination of the City of Wheatland, approximately 4.5 miles from the Yuba Cite has not been taken into consideration. Wheatland would be more likely to bear burdens caused by placement of a casino in Yuba County, yet it was not factored into any but a minority of studies, and only after they brought their case forward. *Note the City of Wheatland and its schools created resolutions in opposition of placement of a casino in Yuba County.*

EXHIBIT A

Google maps

Get Google Maps on your phone
 Text the word "GMAPS" to 466453

5 MILE RADIUS



Legend

⊗ = Site

larger circle represents less than 5 mile radius.

Come see one worker's 'treehouse in the sky'



EXHIBIT B

THE SACRAMENTO BEE



BEE'S TOP 20 IN HIGH SCHOOL FOOTBALL
A new season, but familiar team is No. 1

Thursday, August 19, 2010

sacbee.com

TOP STORIES

OUR REGION

The DA's office is requiring a guilty plea before moving a mentally ill woman to a locked mental facility. B1

park experience.

ON

February 2009: State workers begin first of 46 unpaid furlough days.

OFF

June 30, 2010: Gov. Arnold Schwarzenegger allows furloughs to expire.

ON

July 28: Schwarzenegger orders new round of furloughs until budget impasse ends.

OFF

Aug. 9: Alameda Superior Court judge issues temporary stay blocking order.

ON

Wednesday: California Supreme Court sides with governor and lifts stay.

IT'S FURLOUGH TIME AGAIN

SLEEP TRAIN AMPHITHEATRE

A sharp concert site has gone flat

SHOWS SCARCE AS ECONOMY HITS FANS' WALLETS

By DALE KASLER
dkasler@sacbee.com

Something rare is coming to the Sleep Train Amphitheatre on Saturday: a concert.

The appearance by rocker John Mayer will be just the fifth show this year, out of a total of nine. That's one-third

as many shows as in 2000, the venue's inaugural season.

The amphitheater south of Marysville was originally hailed as a catalyst for revitalizing rural Yuba County. But with ticket sales spotty and the economy weak, its future is unclear.

The venue was put up for sale three years ago by its owner, concert promoter Live Nation Entertainment Inc. Asking price: \$2.7 million, a fraction of its cost.

What's more, Live Nation, in order to limit competition, refused to sell to anyone wanting to stage live shows. That would put the 18,500-seat venue out of business.

True, a shutdown isn't imminent. Observers say Live Nation is no longer aggressively pushing a sale. Sleep Train Mattress Centers renewed its sponsorship of the amphitheater this year, said the retailer's president, Dale Carlsen.

VENUE | Back page, A16



ANDY ALFARO Bee

A concert seven years ago attracts a crowd at the Sleep Train theatre. Since it opened in 2000 under a different name, the site has seen the number of annual performances drop from 28 to nine. The amphitheater is for sale, but only if the buyer stops live shows.

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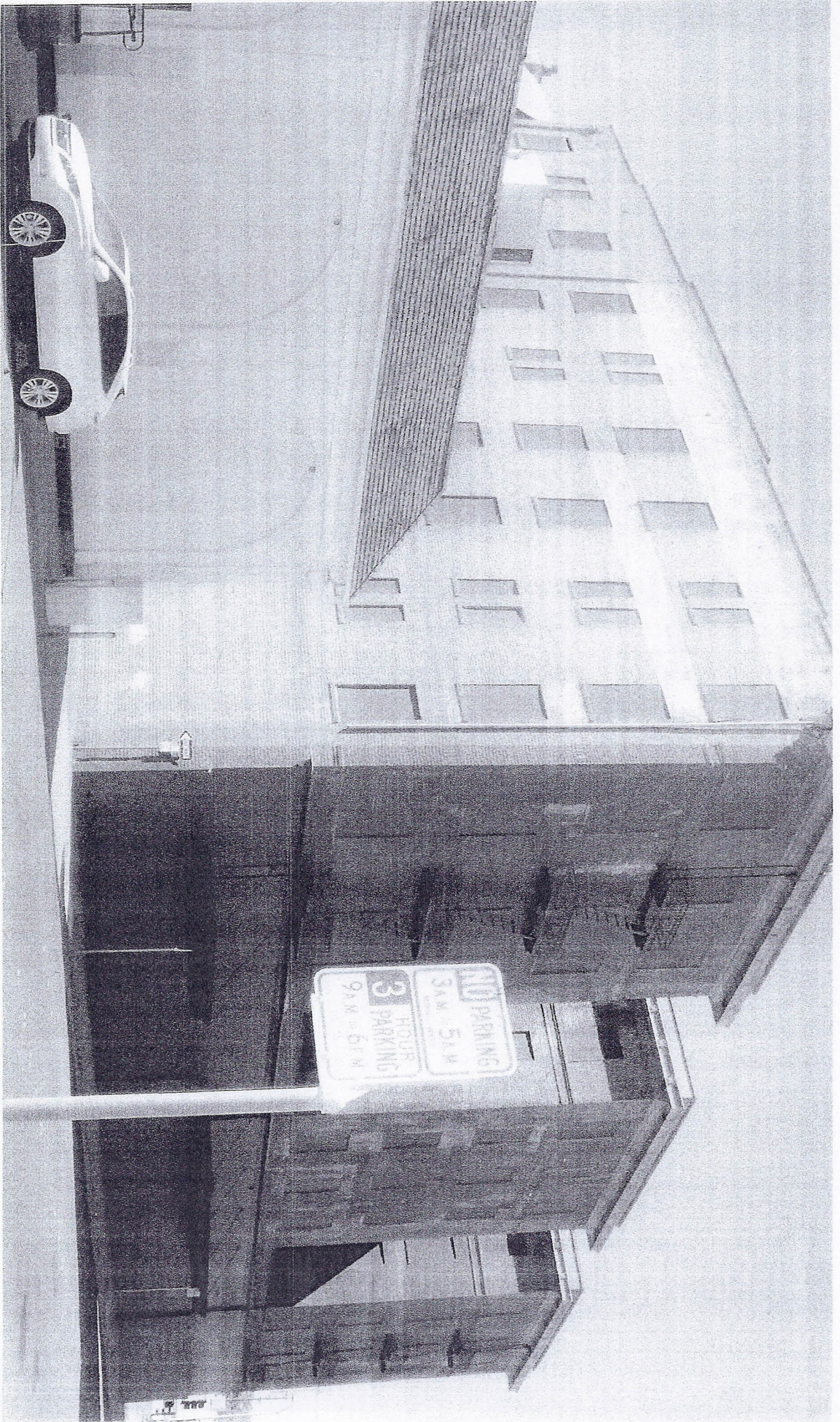
Sunny

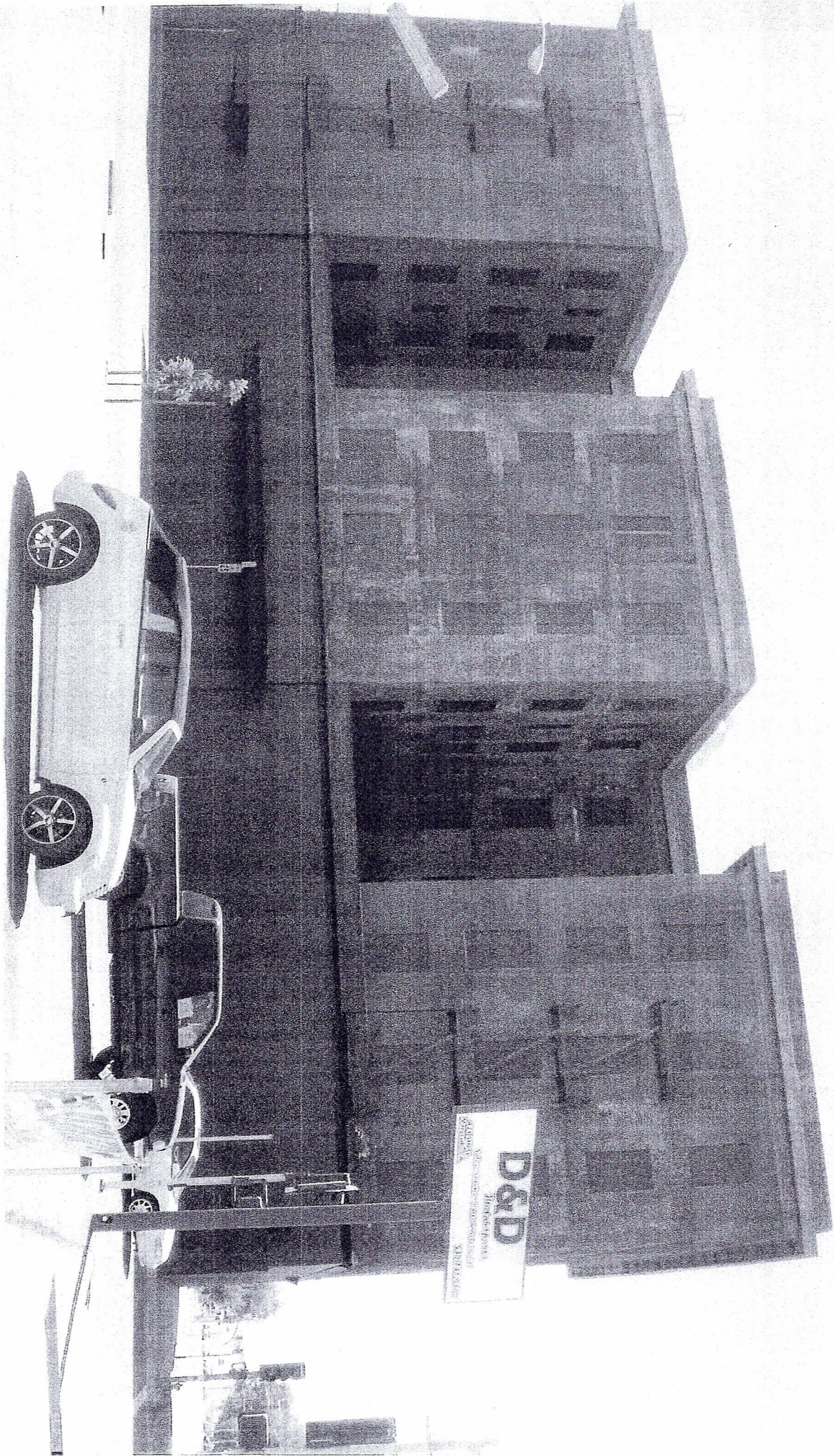
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Complete forecast Page B10



EXHIBIT C
MARYSVILLE HOTEL





D&D
ESTABLISHED
1912