



# *Sierra Nevada Group*

## **Mother Lode Chapter**

**P.O. Box 1042 Nevada City, California 95959**

Dale Morris, Regional Director  
Bureau of Indian Affairs, Pacific Region  
2800 Cottage Way  
Room W-2820  
Sacramento, CA 95825

Via Fax: September 6, 2010  
(916) 978-6099

September 6, 2010

RE: Enterprise Rancheria casino FEIS comments

Dear Mr. Morris,

My name is Barbara Rivenes and I am the Conservation Chair of the Sierra Nevada Group of the Sierra Club. Our Group has a local membership of 1400 in the geographic areas of Nevada, Yuba and Sutter counties. We are a subset of the Mother Lode Chapter with a membership of approximately 18,000 in the eastern foothills of the Sierra Nevada from the Oregon border to the south including Modesto.

We appreciate the opportunity to comment on the Enterprise Rancheria casino project. In general our Group has tried to be diligent in looking at development issues which can cause environmental impacts to citizens in our geographic area. One of our primary concerns is the issue of air quality and how these can be sufficiently mitigated in a project the size of this casino.

Western Nevada County is in a "non-attainment" area for ozone which is created and transported from the northern Sacramento Valley and beyond. The negative health effects from ozone are well known and documented. Hence, we have serious concerns when development that will cause a large influx of automobile traffic and its attendant ozone producing pollutants into our already unhealthy air.

The proposed casino has the potential to impact the environment and the people living in western Nevada County. These potential project impacts must be considered, identified and responded to in the FEIS review. The proposed FEIS fails to review, consider or mitigate these potential impacts as required.

Further, in reviewing the FEIS material we find that in discussion of the project, a 2002 Memorandum of Understanding with Yuba County is referenced and relied upon for many of its mitigations for potential impacts. Our understanding is that no California Environmental Quality Act review process was done in relation to the 2002 MOU and cannot, therefore, be used as a basis for determining that the project proponent has "more than adequately" mitigated impacts to the county and surrounding community through the MOU. The FEIS must not rely on, defer to or utilize the MOU to identify and/or mitigate potential impacts of the proposed project.

The proposed project and EIS process has just recently come to our attention and while we don't question how the BIA has proceeded with its National Environmental Policy Act requirements, as they are well-documented on the website, we are concerned that so little public attention has been paid to such an environmentally significant project in rural Yuba County. It was in February 2008, just two months before the public hearing on the Enterprise casino's DEIS, that a large 5000 home development called Yuba Highlands was defeated in the polls by Yuba County citizens. Sierra Club and other organizations were very active in both the CEQA lawsuit and the winning referendum.

In short, we have not sufficiently concentrated our resources on comments throughout the Enterprise Rancheria casino project and would like to incorporate by reference those more complete comments by Grass Valley Neighbors and Steve Enos, in order to submit this letter in a timely manner. Thank you for your attention to our submission.

Sincerely,

Barbara Rivenes  
Conservation Chair  
Sierra Nevada Group