

Our Community Matters
An Association of Neighbors in Sonoma County, CA

5828 Matilde Drive
Windsor, California 95492

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October 30, 2021

Via U.S. Mail and Email

Email Address: IndianGaming@bia.gov

Paula Hart, Director
Office of Indian Gaming
U.S. Department of the Interior
1849 C Street, N.W.
MS-3543-MIB
Washington, D.C. 20240

Re: Request for Restored Lands Determination by Koi Nation

Dear Director Hart:

Our Community Matters, a neighborhood association of over 150 Sonoma County residents, submits this letter in opposition to the request for a “restored lands” determination sought by the Koi Nation of Northern California, previously called the Lower Lake Rancheria (the “Tribe”). The Tribe announced that it has recently purchased 68 acres of land in the unincorporated area of Sonoma County for the purpose of building a 1.2 million square foot casino calling for 2,500 slot and other gaming machines, a 200-room hotel, six restaurant and food service areas, a meeting center, and a spa. We understand the Tribe is seeking an exception to the prohibition of gaming on newly-acquired lands pursuant to the 1988 Indian Gaming Regulatory Act (“IGRA”).

The subject property contains several vineyards and a single grand residence, located at 222 E. Shiloh Road, Santa Rosa, California (the “Shiloh Property”). Sonoma County records reveal that a California limited liability company named Sonoma Rose LLC purchased the Shiloh Property on September 1, 2021. (See Attachment 1.) The Tribe does not currently hold ownership of the land in its own name.

The Shiloh Property directly abuts the Southeast edge of the Town of Windsor (population 27,447) and lies at the corner of two main traffic arteries, Shiloh Road and Old Redwood Highway. Many houses are directly across the street from the property along East Shiloh as well as Old Redwood Highway, including homes in the Oak Park subdivision and the Colonial Park mobile home park.

Neighbors formed *Our Community Matters* for the sole purpose of opposing the Tribe’s proposed mega-casino and resort on the Shiloh Property, as we are convinced the project would be devastating to our community, cause health and safety issues, and negatively impact the environment. Put simply, the location is inappropriate for the Tribe’s proposed mega-casino and resort project.

For purposes of the Office of Indian Gaming Management’s (“OIGM’s”) review, it is perhaps even more important that the Tribe has no historical connection to the Shiloh Property nor the surrounding community. The Tribe has simply gone shopping for a place to put a casino and, without consulting any neighbors or local government officials, has decided that our backyard is the best place for it. The location, however, is not well-chosen, and construction of the mega-casino and resort will likely have damaging consequences.

Below is a discussion of the issues and what we have discovered.

I. The Tribe’s Request for Permission to Game on the Shiloh Property Should Be Denied Under IGRA

A. IGRA’s Legal and Regulatory Framework

Indian tribes may operate casinos only on “Indian lands” that are eligible for gaming under the IGRA. To be deemed “Indian lands” per the IGRA (25 U.S.C. § 2703), the land must be located within the limits of a tribe’s reservation, be held in trust by the United States for the benefit of the tribe or its members, or be land subject to restrictions against alienation by the United States for the benefit of the tribe or its members. Additionally,

the tribe must have jurisdiction and exercise governmental powers over the gaming site. If the land is not “Indian lands” and fails to meet these other requirements, then it is subject to state gambling laws.¹

Importantly, the IGRA (25 U.S.C. § 2719 (“Section 2719”)) contains a general prohibition against gaming on lands acquired into trust after October 17, 1988. Tribes may game on such after-acquired trust land only if the land meets one of the two exceptions listed in Section 2719:

1. If the Secretary, “after consultation with the Indian tribe and appropriate State and local officials, including officials of other nearby Indian tribes, determines that a gaming establishment on newly acquired lands would be in the best interest of the Indian tribe and its members, and would not be detrimental to the surrounding community, but only if the Governor of the State in which the gaming activity is to be conducted concurs in the Secretary's determination” (25 U.S.C. § 2719(b)(1)(A)); and
2. The lands are “taken into trust as part of— (i) a settlement of a land claim, (ii) the initial reservation of an Indian tribe acknowledged by the Secretary under the Federal acknowledgment process, or the restoration of lands for an Indian tribe that is restored to Federal recognition.” (25 U.S.C. § 2719(b)(1)(B)(iii).)

Our Community Matters understands the Tribe is not seeking to utilize the first of these exceptions to obtain permission to build a casino on its newly-acquired land per 25 U.S.C. § 2719(b)(1)(A), as doing so would require it to consult with State and local officials and other nearby tribes. Rather than reaching out to these community groups and officials to gain support for its mega-casino project, the Tribe simply announced it via the press, to the surprise of Federal, State, and local officials.² The Tribe is seeking to circumvent this collaborative process most likely due to the fact that it has used it in the past to no avail: we understand the Tribe’s previous requests to build casinos in Vallejo and Oakland were soundly rejected.

The Tribe is thus currently invoking the second exception, seeking to be deemed a “restored tribe” and for its purchase of the Shiloh Property to be considered a “restoration of lands” under Section 2719(b)(1)(B)(iii). While a District Court has determined the Tribe is a “restored tribe” under IGRA,³ the Tribe’s request for the Shiloh Property to be deemed a “restoration of lands” should be rejected.

Because the IGRA does not define the term “restoration of lands,” and the language is susceptible to multiple meanings, it is subject to interpretation by the Department of Interior (“DOI”) through regulation.⁴ The DOI has adopted regulations to interpret the exception, as well as “[w]hat must be demonstrated to meet the ‘restored lands’ exception” found at 25 U.S.C. § 2719(b)(1)(B)(iii). (25 C.F.R. § 292.7; Gaming on Trust Lands Acquired After October 17, 1988, 73 Fed. Reg. 29,354 (May 20, 2008) (“Part 292”).)

¹ See National Indian Gaming Commission: Definitions Under the Indian Gaming Regulatory Act, 57 Fed. Reg. 12382, 12388 (1992).

² See <https://www.pressdemocrat.com/article/north-bay/koi-indian-tribe-unveils-plans-for-600-million-casino-resort-in-sonoma-cou/>.

³ See *Koi Nation of N. California v. United States Dep't of Interior*, 361 F. Supp. 3d 14 (D.D.C. 2019), amended sub nom. *Koi Nation of N. California v. United States Dep't of the Interior*, No. CV 17-1718 (BAH), 2019 WL 11555042 (D.D.C. July 15, 2019), and appeal dismissed sub nom. *Koi Nation of N. California v. United States Dep't of the Interior*, No. 19-5069, 2019 WL 5394631 (D.C. Cir. Oct. 3, 2019). While there may be other challenges to the Tribe’s status as a “restored tribe” under IGRA not addressed in that decision, *Our Community Matters* expresses no opinion on that issue.

⁴ See, e.g., *Grand Traverse Band of Ottawa and Chippewa Indians v. U.S. Attorney for W. Dist. of Mich.*, 198 F. Supp. 2d 920, 928 (W.D. Mich. 2002), aff'd 369 F.3d 960 (6th Cir. 2004); *Oregon v. Norton*, 271 F. Supp. 2d 1270, 1277 (D. Or. 2003).

Pursuant to Part 292, to show that lands qualify as “restored,” a tribe must establish:

- (a) a modern connection to the lands;
- (b) a significant historical connection to the lands; and
- (c) a temporal connection between the date of acquisition and the tribe’s restoration.

(25 C.F.R. § 292.12 (“Section 292.12”).)

To demonstrate a “significant historical connection” under Part 292, a tribe can either (a) show that “the land is located within the boundaries of the tribe’s last reservation under a ratified or unratified treaty”; or (b) “demonstrate by historical documentation the existence of the tribe’s villages, burial grounds, occupancy or subsistence use in the vicinity of the land.” (25 C.F.R. § 292.2.) As the DOI explained in the preamble to Part 292, the word “significant” was used because it “reinforces the notion that the connection must be something more than ‘any’ connection.” (73 Fed. Reg. at 29,366.)

Further, the structure of Section 292.12 indicates that the connection demonstrated must be to the newly-acquired land itself, not simply its surrounding area. As explained in the preamble to the final rule promulgating Part 292, what is required is “something more than evidence that a tribe merely passed through a particular area.” (73 Fed. Reg at 29,366.)

B. The Shiloh Property is Not the Tribe’s “Restored” Lands

The Tribe’s request for the Shiloh Property to be deemed its “restored” lands does not meet Section 292.12’s second requirement, that the Tribe have a “significant historical connection” to that land, for two reasons.

First, the Shiloh Property is not located within the boundaries of the Tribe’s last reservation under a ratified or unratified treaty. (See 25 C.F.R. § 292.2.) The Tribe’s last reservation was purchased by Congress in 1916: a 140-acre parcel in Lake County between the towns of Lower Lake and Clear Lake Heights known as Purvis Flat. Purvis Flat is approximately 49 miles from the Shiloh Property; the Shiloh Property simply does not fall within the reservation’s boundaries. Further, on its website, the Tribe verifies that after the government sold Purvis Flat to Lake County for a municipal airport, the Tribe became landless.⁵ Accordingly, the Tribe cannot reasonably claim the Shiloh Property is located within the boundaries of the Tribe’s last reservation.

Second, research has revealed no evidence to demonstrate the existence of the Tribe’s villages, burial grounds, occupancy or subsistence use in the vicinity of the Shiloh Property. (See 25 C.F.R. § 292.2.) In fact, the Tribe’s ancestral home was on an island in Clear Lake in Lake County, approximately 55 miles North of the Shiloh Property.⁶ The distance between the Shiloh Property and the Tribe’s ancestral lands is just too great to demonstrate a “significant historical connection” between the two. In addition, the Tribe’s lack of historical connection to the Shiloh Property area was also recently verified in a Cultural Resources Study focusing on property at the corner of Shiloh Road and Old Redwood Highway, presented to the Town of Windsor’s Planning Commission regarding a proposed residential project at that corner.⁷ While nine tribes were listed as possibly having a historical connection to the area, none of them were the Koi Tribe.

While the Tribe will likely argue that some of its members have resided in Sonoma County over the past hundred years or so, such a factor is insufficient to demonstrate a “significant historical connection” to the Shiloh Property. Indeed, while a tribe’s activities in the vicinity of a property may be used to reasonably infer a

⁵ See <https://www.koinationsonoma.com/history/>.

⁶ See <https://www.koinationsonoma.com/history/>.

⁷ See https://windsor-ca.granicus.com/MetaViewer.php?view_id=2&clip_id=1308&meta_id=81164, at pages 10, *et seq.*, and Attachment A.

tribe used the subject property for subsistence use, no such inference can be made by showing tribal members lived within a 10-20 mile radius of the property in modern times. Section 292.12 requires the Tribe to show a connection to the newly-acquired land *itself*, not just the surrounding area, as it provides that “[t]o establish a connection to the newly acquired lands [for the purposes of the restored lands exception] . . . [t]he tribe must demonstrate a significant historical connection *to the land*.” (emphasis added). Research has revealed no evidence the Tribe or its members have had any connection to the Shiloh Property *itself*, and such a connection is highly unlikely due to the fact the property has been in private hands.

Moreover, the DOI’s past “restored lands” decisions also demonstrate the Shiloh Property should not be declared a “restoration of lands” for the Tribe. For example, on February 7, 2019, the DOI denied a request by another Lake County Indian tribe, the Scotts Valley Band of Pomo Indians (“Scotts Valley”), for a “restored lands” determination for its newly-acquired parcel in the City of Vallejo, California.⁸ In fact, Scotts Valley had a stronger case than the Tribe for a restored lands determination, as it claimed its ancestors collected provisions near the subject land, and that a tribal chief traveled in the region throughout his life, may have been baptized 17 miles from the land, and worked as a ranch hand and migrant laborer in the area of the land. Despite these ties, the DOI determined that Scotts Valley had failed to show a “significant historical connection” to the subject land because the intermittent presence of the Tribe’s ancestors did not indicate a broader presence to the area as a whole, and there was no evidence of ancestral use of the subject land itself. Scotts Valley has sought to overturn that decision via judicial review, and the DOI’s motion papers filed in the case on October 1, 2021, demonstrate its commitment to enforcing current DOI regulations and policies on those issues.⁹

Moreover, the Federated Indians of Graton Rancheria has gone on record opposing the Tribe’s request for a “restored lands” determination for the Shiloh Property. Specifically, Chairman Greg Sarris stated in an article he authored: “This is an egregious attempt at reservation shopping outside the Koi Nation’s traditional territory and within the territory of other federally recognized tribes.”¹⁰ *Our Community Matters* believes this is the heart of the issue, and that the Tribe’s request for the Shiloh Property to be deemed its “restored” lands should be denied.

II. The Shiloh Property is an Inappropriate Location for a Casino and Resort

While not expressly part of the “restored lands” analysis, *Our Community Matters* believes it is also important to consider how inappropriate the Shiloh Property is for the location of a mega-casino and resort, as follows.

A. Proximity to Residences, Parks, and Elementary Schools

As shown on an aerial view of the Shiloh Property (*see* Attachment 2), it is located across the street from two housing areas on the North side and a mobile home park the West side (there is also a church on the West side). Esposti Park, which is a sports park utilized heavily by Little League teams, is located directly North across the street from the Shiloh Property at the corner of E. Shiloh Road and Old Redwood Highway.

In addition, the attached photo does not show the following: (1) Shiloh Park, a Sonoma County Regional Park which allows for nature-based hiking and horseback riding, is located just 0.4 miles to the West of the Shiloh Property; (2) San Miguel Elementary School, including its surrounding residential neighborhood, is located just 1.4 miles South of the Shiloh Property; (3) Mark West Union Elementary School, including its surrounding residential neighborhood, is located just 1.9 miles from the Shiloh Property; (4) Mattie Washburn Elementary

⁸ See <https://www.timesheraldonline.com/wp-content/uploads/2019/08/DOI-Letter-Scotts-Valley-Restored-Lands-Decision-re-Vallejo-2-7-2019-1.pdf>

⁹ See *Scotts Valley Band of Pomo Indians v. U.S. Dept. of the Interior*, U.S. Dist. Ct., District of Columbia, Case No. 1:19-CV-01544-ABJ, Memorandum in Support of Federal Defendants’ Cross Motion for Summary Judgment and in Opposition to Plaintiff’s Motion for Summary Judgment, Dkt. No. 55, Filed October 1, 2021.

¹⁰ See <https://www.pressdemocrat.com/article/news/graton-rancheria-statement-on-koi-nations-application-for-gaming-facility/>.

School, including its surrounding residential neighborhood, is located just 2.1 miles away from the Shiloh Property; and (5) both Shiloh Road and Old Redwood Highway are major travel arteries for the community.

There is simply insufficient space between the Tribe's proposed mega-casino/resort and these residences, parks and schools to prevent negative effects from noise pollution, light pollution, car exhaust pollution, and traffic from impacting the community. The ecological effects alone in this relatively rural and bucolic area would be substantial. Moreover, the associated negative aspects that ride along with casinos, such as theft, vandalism, drug use, trespassing, etc., would have an overwhelmingly negative impact on our small community.

Further, we are experiencing extreme drought at this time,¹¹ which is expected to be the new normal due to climate change. The Tribe's proposed mega-casino and resort would put tremendous demands on our local resources, including our water table, which we expect will cause water and other conditions to worsen.

B. Lack of Sufficient Wildfire Evacuation Corridors

In the 2017 Tubbs wildfire, over 5,300 homes in Sonoma County burned to the ground. Many of those homes were located just a few minutes' drive to the South of the Shiloh Property. The wildfire came without warning in the night, and there were no emergency messages or evacuations. Since that time, local emergency services aim to provide sufficient warning of wildfires, to enable residents to evacuate with their lives, their pets, and some property.

Attachment 3 to this letter contains a map showing the number and locations of wildfires in the area since 2015 which have ravaged our landscape, both physical and emotional. *Our Community Matters* members have evacuated two to three times in the past four years due to wildfires. For example, in 2019, our members and 50,000 Sonoma County residents were ordered to evacuate to escape the Kincadee Wildfire. Evacuating residents caused traffic jams at the corner of Old Redwood Highway and Shiloh Road, which became almost impassable. Highway 101, the primary North-South artery, was at a standstill Southbound, leading away from the fire.

The Tribe's proposal to develop a mega-casino and resort on the Shiloh Property could very well have life threatening consequences for our community members, as there are simply not enough evacuation routes for us let alone the tens of thousands of people the Tribe expects to host on the property. Further, removing the vast majority of the vineyards on the Shiloh Property will increase the fire threat to our community, as vineyards have proven to be a significant fire break.

C. Lack of Hospitality Workers

The Tribe has indicated it plans on hiring 1,100 employees to work the casino and resort. However, there is a shortage of hospitality workers in our area that has reached the critical stage. In fact, a local restaurant just down the street from the Shiloh Property recently announced it will have to close because it cannot find workers to staff it.¹²

The local newspaper, the Press Democrat, reported in a September 1, 2021, article that "[t]hroughout the country, restaurants are facing a critical shortage of workers... Locally, restaurants have even resorted to

¹¹ See <https://www.drought.gov/states/California/county/Sonoma>.

¹² See <https://www.sonomamag.com/this-is-the-new-reality-popular-santa-rosa-creperie-closes-for-lack-of-staff/?gSlide=1>.

closing on certain days, because of the staffing crunch.”¹³ The workforce shortage is due primarily to the “extremely high cost of living and a shortage of affordable, workforce housing” in our area.¹⁴

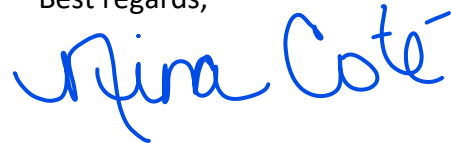
Our Community Matters is concerned about the Tribe’s proposed mega-casino and resort taking employees away from our local businesses, causing more of them to close and further decreasing the unique and diverse aspects of our community.

III. Conclusion

Our Community Matters urges the OIGM to reject the Tribe’s request for a “restored lands” exception to the prohibition of gaming on newly-acquired lands. We believe the Shiloh Property is not the Tribe’s restored lands, and that the Tribe has no actual connection to that land from either a modern or historical perspective. Moreover, we believe that the Tribe’s proposed mega-casino and resort would be simply devastating to our community.

We appreciate your consideration of these issues. Should you have any questions, or would like further information, please let me know.

Best regards,



Nina Cote
Steering Committee Chair
Our Community Matters

cc: Robert Pittman, County Counsel, County of Sonoma – Email only: robert.pittman@sonoma-county.org
Jose Sanchez, City Attorney, Town of Windsor – Email only: jsanchez@meyersnave.com
Jared Huffman, U.S. Representative – Fax only: (202) 225-5163
Michael Thompson, U.S. Representative – Fax only: (202) 225-4335
Gavin Newsom, Governor of the State of California – Fax only: (916) 558-3160
Darryl LaCounte, Director of the Bureau of Indian Affairs, DOI

¹³ See <https://www.northbaybusinessjournal.com/article/news/starks-restaurant-group-in-sonoma-county-hosts-party-and-lottery-to-coax-wo/>; see also <https://www.pressdemocrat.com/article/news/sonoma-county-restaurants-still-struggling-in-2021/>; see also <https://www.pressdemocrat.com/article/business/sonoma-county-hospitality-sector-struggles-to-find-workers-despite-high-job/>; see also <https://www.sonomanews.com/article/news/help-wanted-sonoma-valley-businesses-struggle-to-hire/>.

¹⁴ See <https://www.northbaybiz.com/2021/07/19/labor-shortages-in-a-post-pandemic-world/>.

Attachment 1

Page 1 of 3

This document was electronically submitted to the County of Sonoma for recording

2021100185

Official Records of Sonoma County
Deva Marie Probst
09/03/2023 08:11 AM
FIDELITY NATIONAL TITLE | SONOMA NAPA | EFN

DEED 3 Pgs

Fee: \$50.00
County Tax: \$13,530.00



RECORDING REQUESTED BY:
Fidelity National Title Company

When Recorded Mail Document
and Tax Statement To:
SONOMA ROSE, LLC

Escrow Order No.: FSNX-7052000491CF
Property Address: 222 E. Shiloh Road,
Santa Rosa, CA 95403
APN/Parcel ID(s): 059-300-003-000

SPACE ABOVE THIS LINE FOR RECORDERS USE

Exempt from fee per GC 27388.1(a)(7). This document is a transfer that is subject to Documentary Transfer Tax.

GRANT DEED

The undersigned grantor(s) declare(s)

- This transfer is exempt from the documentary transfer tax.
 The documentary transfer tax is \$13,530.00 and is computed on:
 the full value of the interest or property conveyed.
 the full value less the liens or encumbrances remaining thereon at the time of sale.
The property is located in an Unincorporated area.

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, Randall C. Clifton and Cynthia A. Clifton, Trustees of The Randall C. Clifton and Cynthia A. Clifton Trust Agreement dated June 30, 2005

hereby GRANT(S) to SONOMA ROSE, LLC, a California limited liability company

the following described real property in the Unincorporated Area of the County of Sonoma, State of California:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF

PROPERTY COMMONLY KNOWN AS: 222 E. Shiloh Road, Santa Rosa, CA 95403

MAIL TAX STATEMENTS AS DIRECTED ABOVE

Grant_Deed
SCAD000129.doc / Updated: 04.06.20

Printed: 09.01.21 @ 10:36 AM
CA-FT-FSNX-180-090725-FSNX-7052000491

GRANT DEED
(continued)

APN/Parcel ID(s): 059-300-003-000

Dated: September 1, 2021

IN WITNESS WHEREOF, the undersigned have executed this document on the date(s) set forth below.

The Randal C. Clifton and Cynthia A. Clifton Trust Agreement dated June 30, 2005

BY: Randal C. Clifton
Randal C. Clifton, Trustee

BY: Cynthia A. Clifton
Cynthia A. Clifton, Trustee

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of San Diego

On September 1, 2021 before me, Conrad Fernandez Notary Public,
(here insert name and title of the officer)

personally appeared Randal C. Clifton and Cynthia A. Clifton
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

[Signature]
Signature



EXHIBIT "A"
Legal Description

For APN/Parcel ID(s): 059-303-003-000

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE UNINCORPORATED AREA IN COUNTY OF SONOMA, STATE OF CALIFORNIA AND IS DESCRIBED AS FOLLOWS:

Being a tract of land in Section 20, Township 8 North, Range 8 West, M.D.B. and M. and beginning at a iron pin which marks the 1/4 section corner between Sections 19 and 20; thence East along the Northerly line of the Southwest 1/4 of said Section 20, a distance of 40.00 chains, more or less, to the center of Section 20; thence South, along the Easterly line of said Southwest 1/4, 17.01 chains, more or less, to the Northeast corner of a tract of land conveyed by Elisha C. Mayo to Charles T. Mathisen and Cynthia E. Mathisen, his wife, by Deed dated January 28, 1905 in Book 216 of Deeds at Page 298, Sonoma County Records; thence South 76° 15' West, along the Northerly boundary of said tract of land conveyed to said Mathisen, 25.69 chains, more or less, to the center of the State Highway leading from Santa Rosa to Healdsburg; thence Northwest along the center of said State Highway, 26.85 chains, more or less, to the section line between Section 19 and 20; thence North along said section line, 1.62 chains, more or less, to the point of beginning.

Excepting therefrom that portion thereof conveyed to the County of Sonoma by deed recorded April 25, 1950 in Book 955 at Page 376, Sonoma County Records.

Also excepting therefrom that portion conveyed to the County of Sonoma by Deed recorded October 27, 2006 as Instrument No. 2006132956, of Official Records.

Attachment 2

Aerial Photo of the site of the Casino and Resort proposed by the Tribe, located at 222 E. Shiloh Road, Santa Rosa, CA. The Casino and Resort project is outlined in blue; Esposti Park is outlined in green; the pink line shows the boundaries of the Town of Windsor to the North versus unincorporated Sonoma County to the South.

The proposed Casino and Resort is a 1.2 million-square-foot project calling for 2,500 slot and other gaming machines, a 200-room hotel, six restaurant and food service areas, a meeting center and a spa. It is expected to employ approximately 1,100 employees.



Photo obtained from the SoCoNews: https://soconews.org/scn_windsor/news/windsor-officials-clarify-town-not-involved-with-koi-nation-casino/article_0e7adef2-2871-11ec-93c3-536857a5e1cf.html and not verified by Our Community Matters.

Attachment 3

Locations of Recent Wildfires (Since 2015)

