

**CITY OF REDDING**

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**JULIE WINTER, MAYOR**

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May 22, 2019  
L-010-075-575

Ms. Amy Dutschke  
U.S. Department of the Interior  
Bureau of Indian Affairs  
Pacific Region Office  
2800 Cottage Way  
Sacramento, CA 95825

Subject: Comments on the Draft Environmental Impact Statement for the Redding  
Rancheria Fee-to-Trust and Casino Project

Dear Ms. Dutschke:

As a Cooperating Agency pursuant to NEPA for the Redding Rancheria Fee-to-Trust and Casino Project Environmental Impact Statement, the City of Redding appreciates this opportunity to provide comments on the Draft Environmental Impact Statement (DEIS). Our comments are as follows:

**ECONOMIC IMPACT**

The following excerpts are from Section 4.7.1, Substitution Effects, of the DEIS:

“Potential substitution effects (the loss of customers at existing commercial businesses to the new business) of a tribal casino on existing gaming, restaurant, recreation, and retail establishments have been considered when evaluating the magnitude of the casino’s impact on the economy.”

“A portion of the substitution effects would come from spending on non-gaming categories, such as food and beverage, retail, lodging, and entertainment that would have occurred at the competing gaming operations had the gaming spending occurred there rather than at Alternative A. A smaller portion would come from spending that would have occurred at non-gaming related businesses but went to Alternative A instead.”

Although the report identifies a potentially negative economic impact to existing sporting goods stores in the City of Redding, it does not identify how the impact will be mitigated. The report suggests the demand for sporting goods in Shasta County cannot support the proposed store along

## **LAND USE**

The following excerpt is from Section 4.9.1, Land Use Plans, of the DEIS:

“Planning documents currently in effect for the Strawberry Fields Site include the Shasta County General Plan (County General Plan) and the Shasta County Zoning Code.”

The DEIS fails to acknowledge that the Strawberry Fields Site is within the City of Redding General Plan Area. The general plan land use classifications of this site consists of “Greenway” and “Residential-1 Dwelling Unit per 5 Acres and Larger.” Pursuant to the 2017 State of California General Plan Guidelines, general plans must cover the territory within the boundaries of the adopting city or county, as well as “any lands outside its boundaries which in the planning agency’s judgement bears relation to its planning” (California Government Code Section 65300).

## **PUBLIC SERVICES**

### **ELECTRICITY**

The following excerpt is from Section 4.10.1, Alternative A – Proposed Project, of the DEIS:

“The City of Redding’s General Plan Policy CDD1G states the following with respect to the provision of public services: “Require annexation before services are provided by the City, except under extraordinary circumstances.” As discussed in more detail below, it is anticipated that the City may provide several public services to the project, which could include water supply service, wastewater service, and electricity. Once the property is taken into trust, local land use regulations would not apply, and neither the County (nor the City, should it pursue annexation of the site) would have land use jurisdiction. This would constitute extraordinary circumstances as described by the City’s General Plan Policy CDD1G. Therefore, it appears that the provision of public services to the site by the City would be in accordance with General Plan.”

The assumption that electricity to serve the project under Alternative A will be provided by REU is speculative since the subject property is located outside of the Redding city limits. Whether or not electricity is provided by REU to properties outside the city limits is at the discretion of the Redding City Council. Therefore, the DEIS must also include an analysis of Alternative A without electricity provided by REU.

### **WATER SUPPLY**

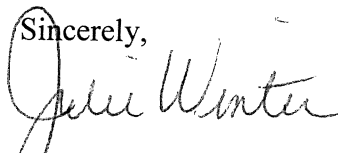
Under Alternative A, Water Supply Option 1, the City of Redding’s water supply system would be extended to the Strawberry Fields Site. Although the City’s water service contract with the U.S. Bureau of Reclamation does not permit the City to provide surface water outside of the City’s service water contract boundaries, the City has the ability to provide groundwater to the site. Therefore, Alternative A, Water Supply Option 1, is a potentially feasible option, although any such service is at the discretion of the City Council.

Ms. Amy Dutschke  
May 22, 2019

Page 5

out of character with existing, approved, and proposed signage adjacent to I-5 within the City of Redding. This issue would be further exacerbated if these signs would be electronic message board signs, which are prohibited within the City of Redding.

The City of Redding looks forward to continued cooperation with the BIA regarding this project and would welcome the opportunity to meet with BIA staff, BIA consultants, and/or Redding Rancheria representatives to discuss our comments in further detail.

Sincerely,  
  
Julie Winter  
Mayor

Attachments

cc: Redding City Council  
Barry DeWalt, City Attorney  
Chuck Aukland, Public Works Director/City Engineer  
Chief Roger Moore, Redding Police Department  
Chief Cullen Kreider, Redding Fire Department  
Daniel Beans, Redding Electric Utility Director  
Larry Vaupel, Development Services Director  
John Abshier, Assistant Public Works Director