



Shasta County

October 1, 2019

Honorable David Bernhardt
Secretary of the Interior
1849 C Street, NW
Washington, DC 20240

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

RE: Redding Rancheria Proposed Fee-to-Trust and Casino Project—Strawberry Fields

Dear Secretary Bernhardt and Ms. Dutschke:

The County of Shasta (County) submits this letter to state its formal opposition to the Redding Rancheria's (Tribe) Fee-to-Trust and Casino Project (Project). The County has reached the conclusion that the Project will have a detrimental impact on the Shasta County community that cannot be adequately mitigated after conducting internal deliberations and receiving community input. The County joins the City of Redding in its opposition to the Project and respectfully requests that the Department deny the Rancheria's pending fee-to-trust application to build a casino on the Strawberry Fields site.

In June, the County submitted comments on the Draft Environmental Impact Statement (DEIS) the Department prepared for the Project. Those comments identified the adverse impacts the Project would have on the County and detailed a number of deficiencies in the DEIS's analysis of impacts to public services, traffic, water resources, air quality, and other resources. The County noted that the analysis of socioeconomic impacts required additional development, particularly with respect to fiscal effects, housing, homelessness, and other social effects, including problem gambling and related impacts. The County also identified serious concerns regarding the effect of the Project on flooding and ground water impacts and traffic. Because the County hoped to negotiate a mitigation agreement with the Rancheria to address those impacts, the comments indicated that the County believed at that time that Project impacts could be adequately mitigated.

Since June, however, the County has received additional information and input from the community and has reached the conclusion that Project impacts cannot be mitigated to the County's satisfaction. The Project would convert 232 acres of agricultural land located within the Sacramento River floodplain into a development, eliminating a valuable greenbelt area and promoting urban sprawl. The County's Zoning Plan is designed to promote and protect the public health, safety, peace, morals, comfort, convenience and

general welfare. The Project site is designated and zoned A-cg (Agricultural-part time cropland/grazing) and A-1 (Limited Agriculture) under the County of Shasta General Plan and Zoning Plan, respectively. Pursuant to Shasta County General Plan Policy AG-g, lands designated A-cg shall be maintained to support both short-term and long-term part-time agricultural activities as the primary land use while allowing subordinate auxiliary uses, including single-family residences. The purpose of the A-1 district is to preserve agricultural lands at a size capable of supporting part-time agricultural operations, typically operated as a hobby or to supplement the occupant's income. Uses permitted outright in the A-1 district consist of single-family residences, agricultural uses, sale of agricultural products grown on the premises, and boutique or small wineries. Clearly, the various urban uses proposed to be developed by the Tribe on the Project site are inconsistent with the County's General Plan and Zoning Plan. The comments submitted by the City of Redding—which identified concerns regarding economic impacts, traffic, land use, public services, and aesthetics—reinforce the County's concerns. Of note, the Project is proposed for land that is essentially on the edge of the boundary separating the City of Redding and the unincorporated area of Shasta County. Thus, impacts are likely to be experienced in both jurisdictions. The community itself has been very active in opposing the Project, both for its environmental impacts and the Rancheria's attempt to invoke the "restored lands" exception to the prohibition on gaming on newly acquired trust lands.

The County has an obligation to protect the community from the adverse impacts of development projects and to reflect the views of the community it represents. Our community is strongly opposed to this Project. The reasons for that opposition are myriad and include the serious environmental, safety, and socioeconomic impacts of the Project. The Rancheria has a casino at a nearby location. The Department should not authorize the Rancheria to develop an unmitigated project at the Strawberry Fields site over the opposition of the surrounding community. Accordingly, the County formally opposes the Project and requests that the Department deny the Tribe's application.

Thank you for your consideration of this important matter. Please feel free to contact me if you would like to discuss these comments.

Respectfully,



Leonard Moty, Chairman
County of Shasta Board of Supervisors

cc: Tracy Edwards, Chief Executive Officer, Redding Rancheria
Julie Winter, Mayor of the City of Redding