



NOTICE OF PREPARATION

PROJECT: Graton Resort & Casino Expansion Project

SUBJECT: Notice of Preparation of a Tribal Environmental Impact Report

CONTACT: Federated Indians of Graton Rancheria
Attn: NOP Comments
6400 Redwood Drive, Suite 300
Rohnert Park, CA 94928

DATE: April 4, 2022 **COMMENT PERIOD:** April 4, 2022 to May 4, 2022

INTRODUCTION

The Federated Indians of Graton Rancheria (Tribe) is the lead agency for the preparation of a Tribal Environmental Impact Report (TEIR) for the proposed Graton Resort & Casino Expansion Project (Proposed Project). The TEIR will examine potential off-reservation environmental effects of the Proposed Project. This Notice of Preparation (NOP) has been prepared to describe the Proposed Project and associated TEIR as well as to solicit public input regarding the scope and content of the TEIR. Comments should identify potential off-reservation environmental issues and reasonable mitigation measures to be addressed in the TEIR, and are due to the above mailing address by 5 pm May 4, 2022.

PROJECT SUMMARY AND BACKGROUND

The Graton Resort & Casino (Resort), owned by the Tribe, is operated pursuant to federal law and the Tribal-State Compact between the Tribe and the State of California (Compact). The Compact sets forth procedures for environmental review. The Tribe proposes to enhance the Resort with the construction of the Proposed Project. The Resort currently includes the existing casino and a 200-room hotel and banquet facility, which were the subject of an exhaustive Environmental Impact Statement review approved by federal agencies in 2010. The existing Resort, which opened in November 2013, includes gaming, dining, hotel, and spa facilities and associated parking. In 2016, the Tribe proposed and issued a TEIR for the addition of 200 hotel rooms and other amenities, however for various reasons that project was never constructed. The Tribe now proposes to expand the Resort with the construction of the Proposed Project, which is described below.

PROJECT LOCATION

The Resort is located immediately west of the City of Rohnert Park in Sonoma County, California, on federal trust land at 288 Golf Course Drive, Rohnert Park, California (**Figure 1**). The Resort is bounded by Wilfred Avenue to the north, Stony Point Road to the west, Rohnert Park Expressway and Business Park Drive to the south, commercial development to the east, and farmland to the west. The Proposed Project will be built on an existing Resort parking lot (**Figure 2**).

PROJECT DESCRIPTION

A site plan is shown in **Figure 3**. Components of the Proposed Project include the following.

- Casino floor expansion (approximately 144,000 square feet)
- New 5-level, 221-room hotel wing
- New 5-level parking structure
- 3,500 seat theater
- Expanded swimming pool area
- Rooftop restaurant
- Additional water tank
- Central plant addition

TEIR SCOPE

Initial analysis of potentially significant off-reservation environmental impacts was conducted using the Off-reservation Environmental Impact Analysis Checklist in Appendix B of the Compact. Issue areas where the Proposed Project will not result in potentially significant off-reservation impacts will be eliminated from detailed discussion in the TEIR. These issue areas include cultural resources, agricultural and forest resources, mineral resources, and recreation. The following off-reservation issue areas have been identified as having the potential to be impacted by the Proposed Project, and will be addressed within the TEIR:

- Aesthetics
- Air Quality
- Biological Resources
- Greenhouse Gas Emissions
- Geology and Soils
- Hazards and Hazardous Materials
- Water Resources
- Land Use
- Noise
- Population and Housing
- Public Services
- Transportation and Traffic
- Utilities and Service Systems
- Cumulative Impacts

The TEIR will assess potential impacts of the Proposed Project on the off-reservation environment and will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts. Issue areas that will and will not be addressed in the TEIR are discussed below.

Aesthetics

Aesthetic resources include scenic vistas, trees, rock outcroppings, historic buildings within a state scenic highway, and night sky conditions. The Proposed Project has the potential to result in changes to the visual character of the area. The TEIR will include a profile view of the Proposed Project, and will assess potential impacts on existing visual characteristics of the off-reservation area. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts to aesthetics.

Agricultural Resources

Agricultural resources include off-reservation areas used to produce, grow, and harvest crops and farmed products. The Proposed Project will be constructed on existing paved and disturbed areas. No off-reservation impacts to agricultural resources are anticipated. The TEIR will not discuss agricultural resources further.

Air Quality

Air quality is defined as the concentration of regulated pollutants, odor, and exposure to sensitive receptors. The Proposed Project has the potential to generate short-term emissions during the construction phase, and long-term emissions related to operation of the Proposed Project. The TEIR will assess off-reservation impacts of the Proposed Project associated with air quality, including consistency with applicable air quality standards and impacts to sensitive receptors from pollutant emissions. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts to air quality.

Biological Resources

Biological resources include sensitive habitats, wetlands and waters of the U.S., and protected plant and animal species. The Proposed Project will be constructed on an area that has been previously paved and developed, and therefore habitat quality on the project site is expected to be low. The TEIR will assess off-reservation environmental impacts of the Proposed Project. The previously issued Biological Opinion for the development of the existing Resort required exclusionary fencing to minimize potential impacts to off-reservation special-status species. This mitigation measure is anticipated to be implemented for the Proposed Project. The TEIR will identify additional mitigation measures, if necessary, to address potentially significant off-reservation impacts to biological resources.

Cultural Resources

Cultural resources include prehistoric and historic properties and items, buildings, bridges, infrastructure, paleontological resources, and resources of importance to the Tribe. The Proposed Project will be constructed on an area that has been previously disturbed by prior development, and these areas have been previously surveyed for cultural resources. Because no off-reservation areas will be disturbed by the Proposed Project, cultural resources will not be further addressed in the TEIR.

Greenhouse Gases

Greenhouse gases (GHGs) are gases that contribute to climate change. The Proposed Project may result in short-term GHG emissions associated with construction, and long-term GHGs associated with operation. The TEIR will assess off-reservation impacts of the Proposed Project associated with GHG emissions, including consistency with applicable GHG standards. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts due to GHGs.

Geology and Soils

Geology and soils include effects from earthquakes, ground shaking, seismic ground failure, landslides, or erosion as a result of the Proposed Project. The Proposed Project will be constructed on-reservation and will meet applicable earthquake safety standards. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts associated with geology and soils.

Hazards and Hazardous Materials

Hazardous materials are those that appear on a list of hazardous materials prepared by a federal, state, or local agency, or that possess characteristics defined as hazardous by such an agency. Certain hazardous materials would be used during construction and operation of the Proposed Project. The TEIR will assess off-reservation impacts associated with hazards and hazardous materials attributable to the Proposed Project. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts associated with hazards and hazardous materials.

Water Resources

Water resources include water usage, wastewater generation, water and wastewater treatment, and water quality. The Proposed Project has the potential to result in increased water use and wastewater generation. Construction of the Proposed Project may increase the potential for erosion and direct or indirect discharge of sediment and other materials into off-reservation drainages near the project site. The TEIR will assess off-reservation impacts of the Proposed Project on water resources, including; compliance with applicable plans, standards, laws, and regulations relating to water resources; off-reservation groundwater supplies and quality; alteration of off-reservation drainage patterns; and off-reservation flood hazards. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts to water resources.

Land Use

Land use is defined as the manner with which land is used and/or modified by its corresponding community. The Proposed Project would not introduce new land uses or alter existing off-reservation land use in the surrounding area. The Proposed Project would be constructed on-reservation, therefore, off-reservation land use plans, policies, habitat conservation plans, or natural community conservation plans would not apply to the Proposed Project. The TEIR will assess the Proposed Project's off-reservation impact on surrounding land uses, habitat conservation plans, and natural community preservation plans. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts to land use.

Noise

Noise is defined as unwanted sound. Construction and operation of the Proposed Project may increase off-reservation noise levels. The TEIR will assess the Proposed Project's off-reservation noise impacts. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts to noise.

Mineral Resources

Mineral resources are defined as the concentration or occurrence of natural, solid, inorganic or fossilized organic material of such grade or quality that it has reasonable prospects for economic extraction. The Proposed Project would be constructed on-reservation and would not impact off-reservation mineral resources. The TEIR will not discuss mineral resources further.

Population and Housing

Population and housing includes the potential for population growth or displacement of housing. The Proposed Project would be constructed on-Reservation and would not displace existing housing. Construction employees would reside within commuting distance of the project site.

The TEIR will assess the Proposed Project's impact on off-reservation population growth. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts associated with population and housing.

Public Services

Public services include fire protection, emergency medical services, and law enforcement. The TEIR will assess whether the Proposed Project would generate the need to construct or alter existing fire, medical, police, or other public facilities. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts to public services.

Recreation

Recreation areas include public parks and other public facilities. The Proposed Project will be built on-reservation in an area previously paved and developed. Therefore, the Proposed Project would not impact off-reservation recreation areas. The TEIR will not discuss recreation further.

Transportation and Traffic

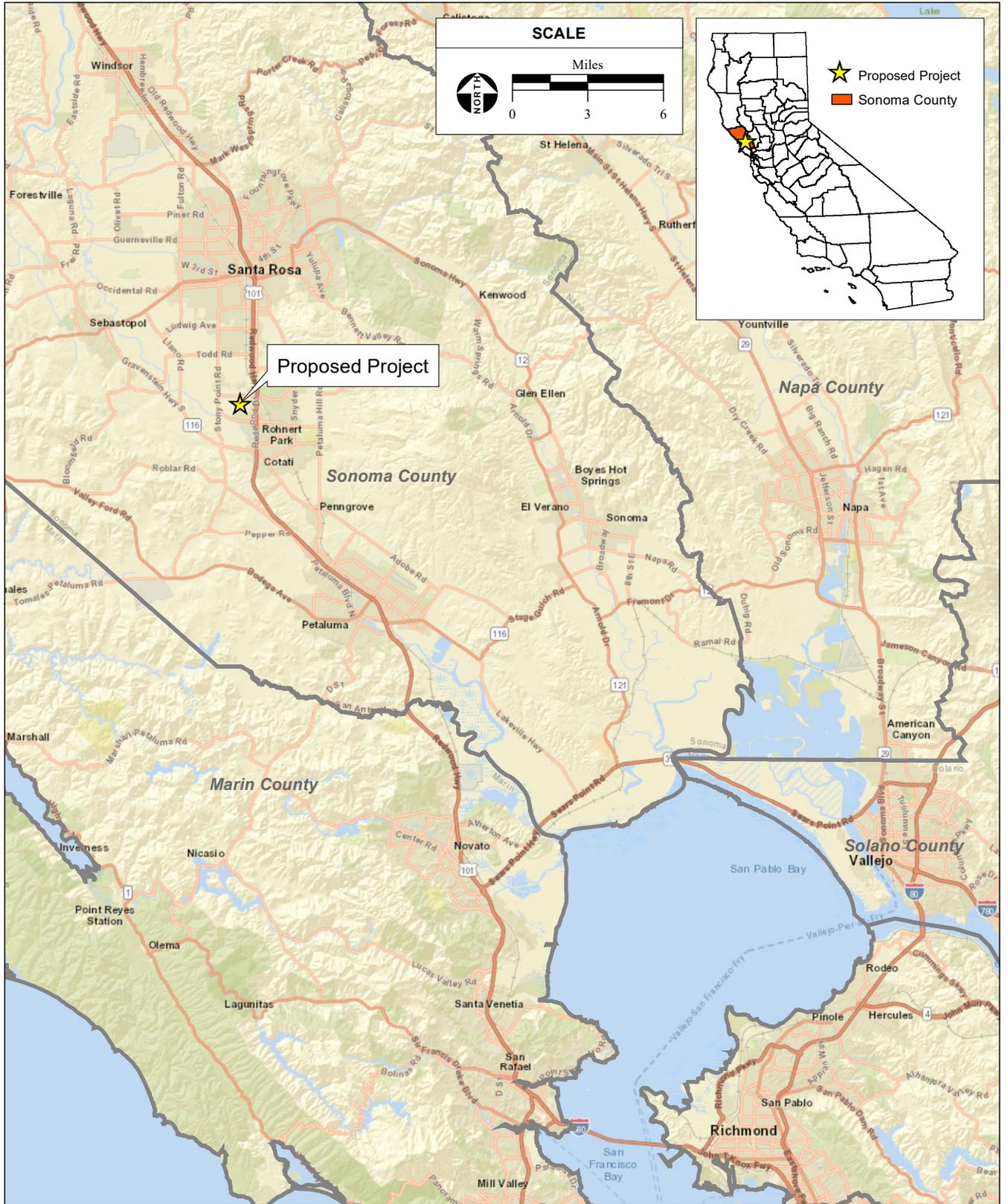
Transportation and traffic include vehicular transportation, public transportation, and alternative modes of transportation, such as bicycles and walkways. The Proposed Project would generate additional short-term vehicular use of roads during construction. The TEIR will assess the Proposed Project's impacts on City, County, and state roads during construction and operation of the Proposed Project. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts associated with transportation and traffic.

Utilities and Service Systems

Utilities and service systems include water supply systems, wastewater, solid waste, and energy services. The existing water supply system and treatment plant on the reservation can accommodate the Proposed Project. Stormwater would be discharged into the existing drainage system. The TEIR will assess the Proposed Project's impacts on off-reservation water and wastewater treatment and drainage facilities. The TEIR will identify mitigation measures, if necessary, to address potentially significant off-reservation impacts to utilities and service systems.

Cumulative Impacts

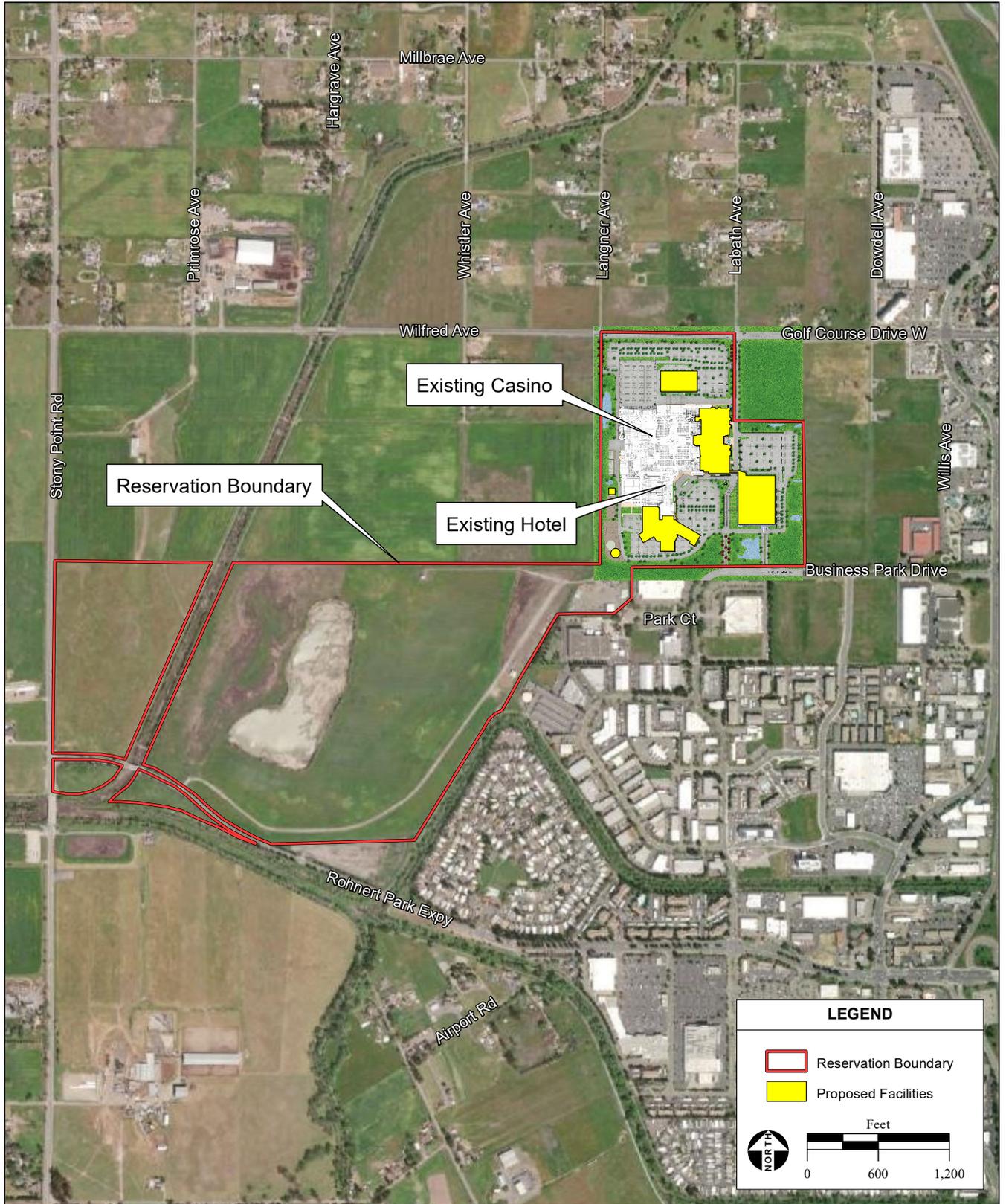
Cumulatively considerable off-reservation environmental impacts of the Proposed Project are those that are considerable when viewed in connection with past, current, or probable future projects. The TEIR will analyze whether the Proposed Project has the potential to result in cumulatively considerable off-reservation impacts.



SOURCE: ESRI World Street Map, 2022; Montrose Environmental, 3/11/2022

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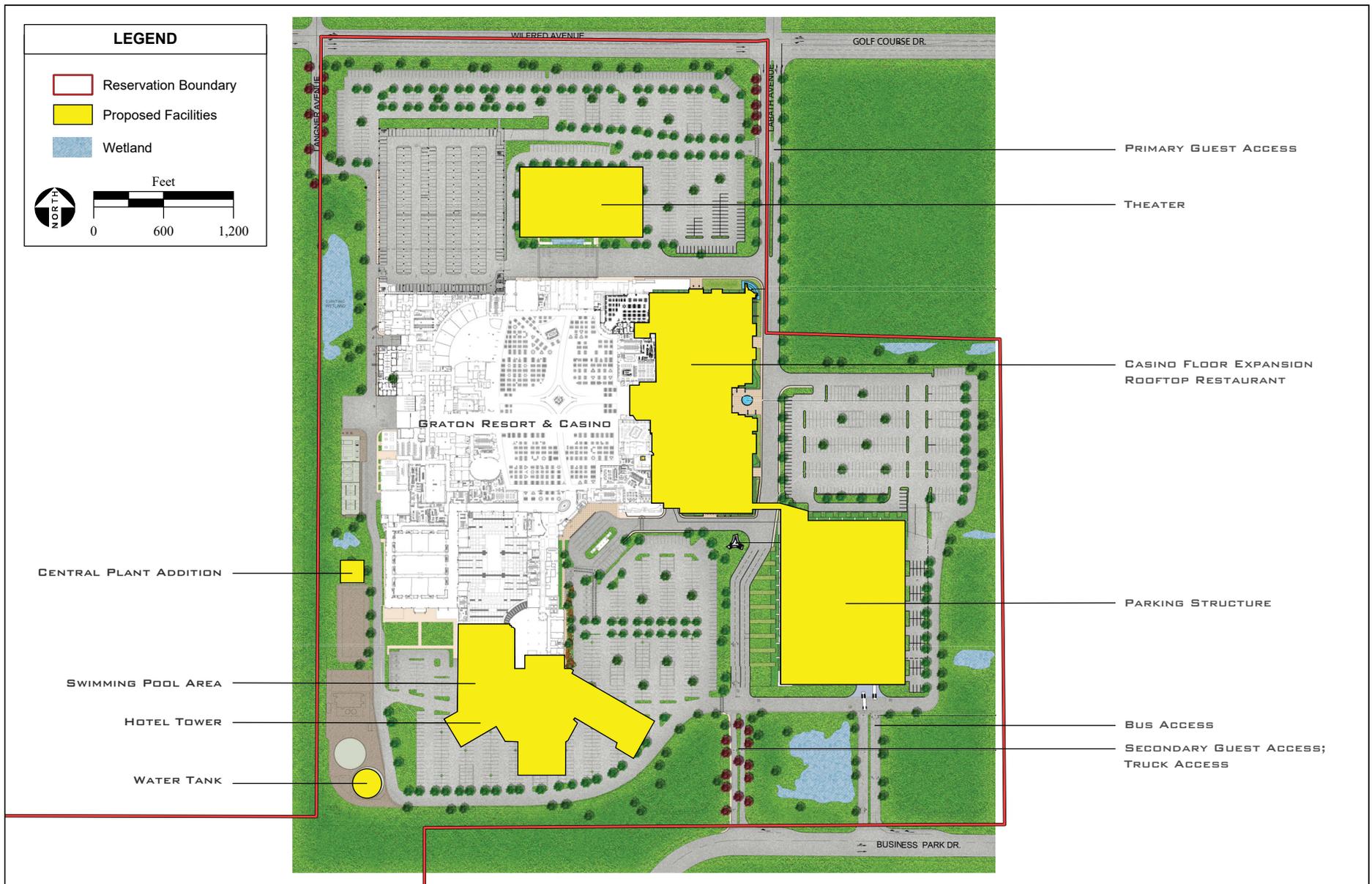
Figure 1
Regional Location



SOURCE: Maxar aerial photograph, 4/16/2021; Montrose Environmental, 3/11/2022

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Figure 2
Site and Vicinity



SOURCE: BWA, 2022; Montrose Environmental, 3/11/2022

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Figure 3
Site Plan