



February 18, 2022

James Gore, Chair, and
Sonoma County Board of Supervisors
575 Administration Drive
Room 100A
Santa Rosa, CA 95403

Re: Opposition to Koi Nation's Application for Gaming Facility in Sonoma County

Dear Chairman Gore and Board of Supervisors:

I write to you on behalf of my tribe, The Federated Indians of Graton Rancheria to ask that the Sonoma County Board of Supervisors pass a formal resolution opposing the Koi Nation's application to the federal government to acquire 68 acres of land in trust for a casino in Sonoma County.

A Koi casino in Sonoma County would violate federal law and set an incredibly dangerous precedent. Federal law requires that a restored tribe have a "significant historical connection" to the land on which it proposes to game. 25 C.F.R. 292.12(b). Department of Interior decisions make clear that "significant historical connection" requires a substantial showing of evidence that is specific to the applicant tribe, not based on evidence regarding a general language group, such as Pomo. *See* Department of Interior, Denial of Guidiville Application in Richmond (Sept. 1, 2011). Moreover, the applicant tribe must show the existence of its ancestral villages, burial sites, subsistence or occupancy and use of the land. The transitory presence of individual tribal members during more recent history is simply not enough. *See* Department of Interior, Denial of Scotts Valley Application in Vallejo (Feb. 7, 2019); Department of Interior, Denial of Scotts Valley Application in Richmond (May 25, 2012). If the Koi Nation were to convince this Administration to break with such clear and important precedent, it would open all of Sonoma County up to casino projects proposed by tribes from many other parts of California.

Koi Nation has sited its proposed gaming land acquisition at 222 E. Shiloh Road, just southeast of Windsor and approximately 50 miles from the Koi Nation's homeland in Lake County -- well outside the Koi Nation's ancestral territory and within the known territory of Sonoma County federally recognized tribes. Koi Nation's ancestral roots are in the Lower Lake

area of Lake County. In 1916, the federal government acquired a rancheria for the Koi Nation in Lake County. In fact, the Koi Nation was previously known as "Lower Lake Rancheria," a reflection of its geographic and cultural ties to the area, but it changed its name in 2012 amid prior attempts to acquire a gaming site in the Bay Area: in the early 2000s, the Koi Nation unsuccessfully attempted to acquire a reservation and build a casino near the Oakland International Airport. Then in 2014, the Koi Nation proposed a reservation and casino on Mare Island in the City of Vallejo, again failing. The Koi Nation now is reviving its attempts to gain access to the Bay Area market through its most recent application for the Shiloh Road site.

Koi Nation's attempts to manufacture a connection to Sonoma County are an affront to Sonoma County tribes such as our own, who have an extensively documented presence here. Unlike the Koi Nation, my tribe has distinct names and village sites within the County, our stories and traditions are tied to this cultural landscape, and our ancestors are buried here. Sonoma County is indigenous to the Southern and Southwestern Pomo language groups. In contrast, the Koi Nation, a Southeastern Pomo tribe, has no ties or affiliation here. The Indian tribes of Sonoma County oppose any efforts by any tribes from outside the area to violate our ancestral territories. For us, this is not merely about gaming but about respecting boundaries and respecting our sovereignty and cultural resources.

We understand that Koi Nation does not have a reservation and accordingly we would support their efforts to establish a reservation in their true homeland in Lake County. Pushing through a proposal to jump into other tribes' territory, however, is wrong and ignores federal law requiring restored tribes to demonstrate a significant historical connection to the lands on which they propose to game. Koi Nation's application is merely a cynical new twist on their past efforts to acquire gaming sites in Oakland and Vallejo.

Accordingly, we join with other Sonoma County tribes in opposition to the Koi Nation's efforts and request that Sonoma County resolve to do the same.

Sincerely,

A handwritten signature in black ink that reads "Greg Sarris". The signature is fluid and cursive, with the first name "Greg" and last name "Sarris" clearly legible.

Greg Sarris
Tribal Chairman

Cc: Robert Pittman Esq., County Counsel, Robert.Pittman@sonoma-county.org
Jennifer Klein Esq., Chief Deputy County Counsel, Jennifer.Klein@sonoma-county.org