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September 18, 2019

Analytical Environmental Services  
Attn: Graton Comments  
1801 7th Street, Suite 100  
Sacramento, CA 95811

Dear Sir or Madam,

On July 22, 2019, the County received the Draft Tribal Environmental Impact Report (TEIR) for the Graton Rancheria Back of House (BOH) Expansion Project (Proposed Project), pursuant to the 2012 *Tribal-State Compact Between The State Of California And The Federated Indians Of Graton Rancheria* (Compact). The Proposed Project consists of the expansion of the Resort's BOH space, which involves the demolition of approximately 3,000 sf of existing BOH space and the construction of approximately 12,000 sf of new BOH space on the western (back) side of the Resort. The new BOH space would be used for expanded offices and employee facilities, including an elevator, cubicles, reception areas, storage rooms, conference rooms, and break rooms. The TEIR states that the Proposed Project will not increase the number of employees, resort activity (customers), or the regional population. The project area is currently developed: about half of the area is existing BOH building space, the other half is used for employee parking. The County has reviewed the TEIR and provides the following comments.

Generally, the County encourages the use of proactive measures, such as best management practices (BMPs), surveys, construction windows, low impact development (LID), plans, testing and monitoring, to avoid, minimize and mitigate potentially significant environmental effects of the project. Specifically, the County recommends that the Tribe continue to consult with the relevant federal, state, and local regulatory agencies on obtaining and maintaining the necessary permits or standards for the project to assure that water and biological resources are protected as needed. The County also recommends the Tribe continue to analyze cumulative impacts associated with increased development both on and off of Tribal lands for future projects.

Development comparable to the Proposed Project located within County jurisdiction would normally trigger an assessment of the new construction for purposes of calculating annual property taxes. Public agencies, including the County, use such revenues to provide, maintain, and improve public services, including those necessitated by the new or expanded development. Additionally, comparable development would generally be subject to County impact fees, which are used to maintain and improve public assets and services impacted by new development such as roads, parks, and affordable housing.

The County appreciates the opportunity to comment on this Draft TEIR and is interested in working with the Tribe to address the concerns and impacts raised in these comments through the negotiation of an

intergovernmental mitigation agreement. If you have any questions regarding these comments, please contact Tribal Affairs Coordinator Marissa Montenegro at [Marissa.montenegro@sonoma-county.org](mailto:Marissa.montenegro@sonoma-county.org) or 707-565-3771.

Sincerely,

DAVID RABBITT, Chair  
Sonoma County Board of Supervisors

CC: Sonoma County Board of Supervisors