



September 15, 2009

Via Electronic Mail: Dale.Morris@bia.gov and John.Rydzik@bia.gov

Dale Morris
Regional Director, Pacific Region, Bureau of Indian Affairs
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

RE: Draft EIS Comments, Soboba Reservation, proposed fee-to-trust Casino/Hotel Project

Dear Mr. Morris and Staff,

Inland Empire Waterkeeper (“Waterkeeper”) is a nonprofit environmental organization with the mission to protect and enhance the water quality of the Upper Santa Ana River Watershed through programs of advocacy, education, research, restoration and enforcement. On behalf of our members, we submit the following comments. Our review focused primarily on the discussions of surface water quality and hydrology in Sections 2 and 5 to protect the water quality of the San Jacinto River Watershed through a state-of-the-art water quality management plan.

First, we look forward to the opportunity to participate in the development of the detailed water quality management plan (or multiple plans as needed) to ensure it complies with the soon-to-be-approved Riverside County Municipal Storm Sewer System (“MS4”) permit. Specifically, we request the plan include detailed schematics, dimensions and descriptions of the ‘sediment/grease traps’, vegetated filter strips, vegetated filter swales, water quality inlets, extended detention basins, sand filters, porous pavement, infiltration basins, infiltration trenches, and how parking lot runoff (including parking structures) will be treated prior to discharge. Currently, there are no details of any proposed treatment methods.

Second, we suggest in the future including a draft water quality management plan as an appendix to the environmental document. Your description of water quality treatment measures in brief paragraphs and bullet-point lists sound promising and visionary but without showing engineered schematics or names of proprietary devices, we are left feeling extremely skeptical of what will actually be implemented and how it will succeed in mitigating urban pollutants.

Third, economies of scale encourage mass-grading of construction sites that can leave hundreds of acres of loose top soil vulnerable to wind and water erosion for extended periods of time. Please indicate how each phase of construction will individually ensure compliance with the statewide construction stormwater permit. If extended periods of time, for example more

than 1 year, are planned between phases, we suggest grading one detention basin sized for a 10-year storm event per phase to catch the erosion.

Inland Empire Waterkeeper cannot support this plan of development as proposed.

Due to the lack of detail in the treatment BMPs, Inland Empire Waterkeeper cannot support this plan of development as proposed. We have collaborated with many of the major builders throughout the region over the past decade. Our goal is to achieve a sophisticated water quality management plan to ensure this project will not cause or contribute polluted runoff. Our comments should be considered constructive criticism of the project as presented. If we can come to an understanding, and we feel the water quality management plan is state-of-the-art, we will publicly support the plan through the entitlement process. Feel free to contact me directly with any questions or concerns at (951) 689-6842.

Sincerely,

Autumn DeWoody

Programs Director

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