



MARIO BIAGI
District 5 Supervisor

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July 30, 2004

SACRAMENTO
AREA OFFICE

Mr. Bill Allan, Acting Chief
Division of Environmental and Cultural
Resources Management and Safety
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825

received
8/05/04 RES

Dear Acting Chief Allan:

Thank you for soliciting the County's input on the environmental analysis process for the Ione Band of Miwok Indian's proposed Fee to Trust Project. I am enclosing herein copies of responses to the Environmental Impact Statement (EIS) from the following departments:

Amador County Unified School District
Amador County Sheriff's Office
Amador County Fire Protection District
California Department of Forestry and Fire Protection
Amador County District Attorney's Office
Amador County Probation Department

Please feel free to contact me with any questions you may have regarding these responses, or if you would like to discuss any other issues relative to the proposed project. I can usually be reached Monday - Friday from 9AM to 4PM at (209) 223-6470. You can also reach me via e-mail at mbiagi@co.amador.ca.us.

Sincerely,

Mario Biagi
Chairman

MB/ma

c: Patrick Blacklock, County Administrative Officer (without enclosures)
Mr. John Hahn, County Counsel (without enclosures)
file



IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS

Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825

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OFFICIAL RECORDS
AMADOR COUNTY, CA.

MAY 27 2004

Mr. Patrick S. Blacklock
County Administrator
Amador County
500 Argonaut Lane
Jackson, CA 95642-9534

Dear Mr. Blacklock:

The BIA would like to thank you for the opportunity to meet and discuss issues related to the Ione Band of Miwok Indians proposed Fee-to Trust Project. As agreed in our discussions at the May 12th meeting, we have included below specific questions related to County operations. The County's answers to these questions will assist the BIA to ensure that the EIS analysis fully and accurately reflects the data, statistics, and information regarding various issues in Amador County.

AMADOR UNIFIED SCHOOL DISTRICT

- Which of the Elementary, Jr. High, and Senior High Schools serve the City of Plymouth? Where are they located?
- What is the current capacity and enrollment of all schools in Amador County?
- Are there any new schools planned or expansions of existing facilities in Amador County? If so, what type of school will it be (e.g., elementary, high school), where will it be located, and what is the planned capacity and enrollment?

AMADOR COUNTY SHERIFFS OFFICE

- Does the Sheriff's Department currently serve the City of Plymouth? If yes, in what capacity?
- Where is the nearest station in relation to the project site? How many police officers use this station?
- What is the response time to the City of Plymouth in both emergency and non-emergency situations?
- What is the County goal for number of officers per population ratio?
- What is the current staffing level per population ratio?
- How does staffing level change during Amador County Fair and what is the rationale behind that change (i.e. expected visitation, past history)?
- What are the Sheriff's office estimates of the additional staffing need that would be required in order to accommodate the proposed casino? What is the rationale behind

these assumptions? Did the County apply this to the Jackson Casino project? Why or why not?

- What are the most commonly committed crimes and their related statistics?
- What are the crime-statistics relating to the Jackson Rancheria and gaming/gambling in Amador County in general?
- Where are the emergency evacuation routes located on Highway 49 and the vicinity?
- What are the future planned police improvements in terms of staffing and infrastructure?
- What is the future projected staffing levels in terms of police to population ratios at planned buildout?

AMADOR COUNTY FIRE PROTECTION DISTRICT AND THE CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION

- What services does the Amador County Fire Protection District and the California Department of Forestry and Fire Protection currently provide to the City of Plymouth?
- Where is the fire service nearest station in relation to the project site?
- What is the response time to the City of Plymouth in both emergency and non-emergency situations?
- What is the goal for the fire staff per population ratio? What is the current staffing level per population ratio?
- How does staffing level change during the Amador County Fair and what is the rationale behind that change (i.e. expected visitation, past history)?
- What are the Fire Departments estimates of the additional staffing need that would be required in order to accommodate the proposed casino?
- What are the most common fire service response statistics for the last year?
- What is the ISO rating of the Fire Department?

AMADOR COUNTY DISTRICT ATTORNEY

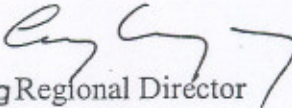
- What services does the Amador County District Attorneys Office provide the City of Plymouth?
- What is the current caseload and staffing ratio of the Amador County District Attorneys Office and the Amador County Probation Department?
- What are the case statistics relating to the Jackson Rancheria and gaming/gambling in Amador County in general?

Although the County has decided not to serve as a Cooperating Agency under NEPA, we are certain that you and the County will take this opportunity to coordinate with the BIA so that the environmental analysis is accurate and complete.

You also asked at our meeting for the names and phone numbers of potential BIA decision makers on this project. It is likely that the decision package will be processed by the Director of the Office of Indian Gaming Management. The current Director is George Skibine. Mr. Skibine can be reached at (202) 219-4066.

We look forward to a continuous productive working relationship with the County of Amador. Please feel free to contact William Allan, Acting Chief, Division of Environmental and Cultural Resources Management and Safety at (916) 978-6043 if you have any questions or concerns.

Sincerely,


Acting Regional Director

cc: Mario Biagi, County Board of Supervisors
Regional Realty Officer, Pacific Region
Chairperson, Ione Band of Miwuk Indians

C. Holm, RF, MS



AMADOR FIRE PROTECTION DISTRICT

500 Argonaut Lane, Jackson CA 95642-9534 (209) 223-6391

June 14, 2004

United States Department of the Interior
Bureau Of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Subject: Ione Band of Miwok Indian's Fee-to Trust Project

Dear Acting Regional Director,

In response to your request for specific information for the EIS on the subject project, Amador Fire Protection District (AFPD) provides the following:

1. *What services does AFPD currently provide to the City of Plymouth?*

AFPD under contract to Plymouth City provides fire protection, fire suppression and emergency response services relating to the protection of lives and property.

2. *Where is the nearest fire station in relation to the project site?*

AFPD Station 122, in the City of Plymouth, is approximately one mile from the proposed project.

3. *What is the response time to the City of Plymouth in both emergency and non-emergency situations?*

Average response time for all AFPD calls is 8.00 minutes. Calls are not tracked by specific zones of response.

4. *What is the goal for fire staff per population ratio?*

AFPD serves the community with volunteer firefighters. Our goal is to provide the best possible service with the volunteer staffing available at any given time. Volunteer recruitment and retention is problematic and the current volunteer roster as well as the very nature of a volunteer system does not guarantee personnel to respond to each emergency in the numbers needed to mitigate that emergency.

4b. *What is the current staffing per population ratio?*

As a volunteer organization the fire stations are not staffed.

5. *How does the staffing level change during the Amador County Fair and what is the rationale behind the change?*

AFPD attempts to insure available staffing for one engine and a rescue squad during the days of the Fair to handle the increased call volume historically associated with this event.

6. *What is AFPD's estimate of the additional staffing need that would be required to accommodate the proposed casino?*

AFPD would require year round 24 hour staffing of one station by three firefighters and one captain. Total personnel needed would be twelve (12).

7. *What are the most common fire service response statistics for the last year?*

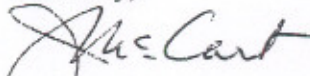
The most common response is for medical aid related emergencies.

8. *What is the ISO rating for AFPD?*

ISO 6/8.

If you should have further questions related to this project please do not hesitate in contacting me.

Sincerely,


Jim McCart, Chief

c. Patrick Blacklock, County Administrative Officer



**AMADOR COUNTY
ADMINISTRATIVE AGENCY**

John C. Begovich Building
500 Argonaut Lane
Jackson, California 95642
Telephone: (209) 223-6470
Facsimile: (209) 257-0619
Website: www.co.amador.ca.us

June 4, 2004

TO: The Honorable Mike Prizmich, Sheriff-Coroner
The Honorable Todd Riebe, District Attorney
Mike Carey, Superintendent, Amador County Unified School District
Jim McCart, Chief, Amador Fire Protection District
Bill Holmes, Unit Chief, California Department of Forestry and Fire Protection

FR: Patrick Blacklock
County Administrative Officer *fb*

RE: BIA Information Request

Attached is a request for information from the Bureau of Indian Affairs (BIA). The BIA is developing an environmental impact statement (EIS) as part of the Ione Band of Miwok Indian's proposed Fee to Trust Project. I am forwarding this request to you, as your agency is included among those from which the BIA is seeking information. Please let me know if you will be responding to this request and if so, I also ask that you copy me with any response.

Thank you in advance for your attention to this matter. If you have any questions please feel free to contact me.

c: Members, Amador County Tribal Relations Committee
John Hahn, County Counsel

Memo



Todd D. Riebe
District Attorney
Public Administrator/Conservator/Guardian

Criminal Division	(209) 223-6444
Investigations	FAX (209) 223-6304
Public Conservator	(209) 223-6444
	(209) 223-6450
Victim Witness	FAX (209) 223-6478
	(209) 223-6474

June 24, 2004

William Allan
United State Department of the Interior
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Re: District Attorney's Response to Questions Submitted by BIA

Dear Mr. Allan:

At the May 12, 2004 meeting between BIA and Amador County Administration and Department Heads, BIA posed several questions to the District Attorney's Office relative to our services to the City of Plymouth, caseload and staffing ratio, and case statistics for the Jackson Rancheria. We are providing the following responses:

I. What Services Does the Amador County District Attorney's Office Provide the City of Plymouth?

The short and simple answer is that we provide the same service to the City of Plymouth that we provide to every other citizen in Amador County, regardless of the location of their residence—investigation and prosecution of crimes committed within the county. We also supervise the Public Conservator and Public Administrator Offices. How we provide these services requires a more detailed answer. Every case referred to my office involves the attorneys and clerical staff. Sometimes, the investigative and/or Victim/Witness staff is involved. What follows is a detailed breakdown of the specific duties typically performed by the employees of the District Attorney's Office:

A. Attorney Services

The time each attorney spends on a criminal case is significant. Specifically, our attorneys provide the following services: (1) review the case and make a charging decision; (2) cause a criminal Complaint and/or Information to be filed; (2) research and prepare all written motions; (4) cause witnesses to be subpoenaed; (5) communicate with witnesses; (6) communicate with law enforcement; (7) communicate with defense counsel; (8) review all discovery (i.e., written

reports, video and audio tapes); (9) prepare for all motions, preliminary hearings, and trials; (10) attend parole hearings; (11) attend meetings with other law enforcement agencies; (12) conduct peace officer training for other law enforcement agencies; (13) conduct public outreach on public safety issues; and (14) provide research and legal advice for Grand Jury and other agencies. A typical motion will take about 1 hour to argue, and 5-7 hours to research and prepare. A typical preliminary hearing, while lasting 1-2 hours, will have taken 5-7 hours of preparation time. A typical trial will last 1-2 days and take 20-30 hours of preparation time. We have found that the most labor intensive cases are those involving drunk driving, controlled substances, or prison crimes as they typically involve numerous motions.

B. Investigative Services

Specifically, our investigative staff is called upon to: (1) obtain copies of video surveillance tapes and reproduce for the defense; (2) obtain copies of audiocassette tapes of interviews and detentions; (3) obtain copies of photos taken; (4) obtain copies of police reports; (5) view physical evidence; (6) conduct witness interviews for named witnesses; (7) conduct interviews of witnesses who were never formally interviewed; (8) write reports based upon interviews; (9) take photos and measurements, and draw diagrams; (10) collect physical evidence from crime scene or in course of investigation; (11) transport physical evidence to experts for testing; (12) prepare written reports regarding evidence; (13) serve subpoenas and transport witnesses; (14) locate witnesses; (15) obtain prior criminal records for defendants and witnesses; (16) testify at motions, preliminary hearings and trials; (17) provide background investigations for other county agencies; (18) attend parole hearings; (19) attend meetings with other law enforcement agencies; (20) conduct peace officer training for other law enforcement agencies; (21) conduct public outreach on public safety issues.

C. Clerical Services

Our clerical staff put in quite a bit of time on each case received. Specifically, in each case they are called upon to: (1) open the file; (2) prepare and file the criminal Complaint and/or Information; (3) provide defense discovery; (4) communicate with the Superior Court; (5) communicate with each law enforcement agency; (6) pull cases for the court calendar; (7) provide supplemental discovery for defense; (8) coordinate the copying of any video and/or audio tapes with the investigative staff and make those copies available to the defense; (9) type, copy, and file any motions; (10) prepare jury instruction packet and verdict forms for trial; (11) prepare subpoenas for motions, preliminary hearings, and/or trials; (12) open and sort all incoming mail; (13) compile statistics for cases; (14) organize case files; and (15) transcribe audio tapes and provide transcription to the defense.

D. Victim/Witness Services

The Victim/Witness staff is typically called upon to: (1) meet with crime victims; (2) attend court appearances with the victims; (3) refer victims to other needed services; (4) assist victims in preparing restraining orders; (5) provide transportation for victims; and (6) assist in coordination of all witness testimony.

II. What is the Current Caseload and Staffing Ratio of the Amador County District Attorney's Office?

A. Attorneys

Our office is staffed by the elected District Attorney, Chief Staff Attorney, and 6 Deputy District Attorneys. The District Attorney and the Chief Staff Attorney handle primarily administration, policies and procedures, personnel issues, Grand Jury issues, training, public outreach, budget preparation and management, attorney assignments, criminal and juvenile cases as assigned, and some criminal charging. In the 2003 calendar year, the District Attorney's Office received 1,098 felony referrals, 2,649 misdemeanor referrals, 1,063 infractions (partial total), and 280 juvenile referrals for a total of 5,090 total criminal referrals. The 6 DDA's handled an average of 848 criminal referrals apiece in 2003.

B. Investigators

Our office is staffed by a Chief District Attorney Investigator, Supervising DA Investigator, 10 full-time and 4 part-time investigators assigned to the Public Conservator's Office, Central Sierra Child Support Office, various grants, child abduction, backgrounds, welfare fraud, prison and Youth Authority crimes, and general criminal investigations. Since not all criminal referrals require investigative services, it is difficult to get an accurate estimate of the average caseload for our investigators. A rough estimate is that the investigators handled an average of 50-70 referrals apiece in 2003.

C. Clerical

Our office is staffed by a Supervisor, 6 legal secretaries, a legal processing clerk, and a paralegal. The 6 legal secretaries and the legal processing clerk handled an average of 727 criminal referrals apiece in 2003.

D. Victim/Witness

Our office is staffed with 1 full-time Program Manager who serves roughly 300-350 victims and witnesses annually.

III. What Are the Case Statistics Relating to the Jackson Rancheria and Gaming/Gambling in Amador County in General?

There currently are no other gaming or gambling establishments in Amador County other than the Jackson Rancheria. In the 2002 calendar year, 65 of the 240 felony filings and 70 of the 1008 misdemeanor filings were for crimes committed at the Jackson Rancheria, representing 27% of the total felony filings and 6.9% of the total misdemeanor filings, respectively. Overall, 135 of the 1,248 total criminal filings for 2002 were for crimes committed at the Jackson Rancheria,

representing 10.8% of the total filings. The total criminal division operational budget for 2002 was \$2,378,000. The Jackson Rancheria cost impact on the criminal division of the District Attorney's Office in 2002 was \$256,824.

Please feel free to contact me if you have any further questions.

Sincerely,

A handwritten signature in cursive script that reads "Todd D. Riebe".

TODD D. RIEBE
DISTRICT ATTORNEY

C: Hahn, RF, MB

OFFICE OF
SHERIFF - CORONER



MICHAEL F. PRIZMICH
SHERIFF - CORONER

June 12, 2004

William Allan, Acting Chief
Division of Environmental and Cultural
Resources Management and Safety
Bureau of Indian Affairs, Pacific Regional Office
United States Department of the Interior
2800 Cottage Way
Sacramento, California 95825

RECEIVED
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2004 JUN 14 PM 1 49
OFFICIAL RECORDS
AMADOR COUNTY, CA.

Dear Mr. Allan;

This letter is in response to your letter to Amador County requesting information to assist with the EIS analysis for the Plymouth Casino, proposed by the Lone Band of Miwok Indians. The letter is actually signed by your Acting Regional Director. However, we can not read the signature and the letter does not indicate what the Director's name is. Please pass this response on to the Acting Regional Director, if that is where it is needed.

To make the responses easier to correlate to the question I will repeat the question from your letter and then articulate our response. I will also number the questions and responses for later ease of reference.

1. Does the Sheriff's Office currently serve the City of Plymouth? If yes, in what capacity?
RESPONSE: The Amador County Sheriff's Office (ACSO) provides general law enforcement services to the City of Plymouth on a contract basis.
2. Where is the nearest station in relation to the project site? How many Sheriff's Deputies use this station?
RESPONSE: The nearest station is in the fire station on Sherwood Street in Plymouth. This is approx. one half mile from the proposed casino site. This station is merely one desk, one file cabinet, and a telephone located inside the office of the Plymouth fire station. A total of three deputies use this facility. The main office and jail of the Amador County Sheriff's Office is located at 700 Court Street in Jackson, approximately fourteen miles from the casino site.
3. What is the response time to the City of Plymouth in both emergency and non-emergency situations?
RESPONSE: The response times to Plymouth can vary greatly. ACSO only contracts 1.5 full time equivalent deputies to Plymouth. If a deputy happens

to be in Plymouth when a call for service occurs our response time in both emergency and non-emergency calls is less than five minutes. However, with Plymouth only contracting for 1.5 FTE deputies there are periods in a twenty-four day where there are no deputies in Plymouth. During those periods the average response time of the ACSO is thirteen (13) minutes to emergency calls and twenty-nine (29) minutes to non-emergency calls.

4. What is the County goal for number of officers per population ration?

RESPONSE: This is a question that works well for condensed urban and suburban populations. This is an almost meaningless question and response for geographically spread out rural populations. Especially when the population bases are small. In suburban areas the common figure to use is 1.5 officers per thousand population. However, if you were to apply this figure to Plymouth it would dictate that Plymouth have approximately one half of an officer to cover the City 24/7. This would obviously be a ridiculous level of service. The goals of ACSO are better captured in the level of service that we need to provide for a given geographic area. In Plymouth the goal would be one officer on duty at all times. With days off, vacations, sick leave, training, etc. it takes seven officers to put one officer on the road 24/7/365. When we add seven officers to the ACSO that is the span of control for one patrol supervisor. Therefore, adding seven deputies requires the addition of one patrol supervisor. This would cover the City with one officer 24/7/365. Which we consider a minimum if a large casino were added to the city. This does not include any factor for law enforcement response to the casino itself.

5. What is the current staffing level per population ratio?

RESPONSE: One and one half (1.5) FTE deputies to approximately three hundred (300) population for the City of Plymouth. The ratio for the unincorporated area of Amador County is approximately two deputies per thousand population.

6. How does staffing level change during the Amador County Fair and what is the rationale behind that change (i.e. expected visitation, past history)?

RESPONSE: ACSO assigns approximately ten deputies and one sergeant to an evening shift on the Amador County Fair grounds, during the County Fair. Two deputies are assigned to the City of Plymouth (outside of the fair) during the County Fair. This is done to have an adequate force to deter and deal with the variety of issues that come up at such a large event with that many people in attendance. There is also the factor of the sales and consumption of alcohol, which contributes to disturbances, driving under the influence, and accidents.

7. What are the Sheriff's Office estimates of the additional staffing need that would be required in order to accommodate the proposed casino? What is the rationale behind these assumptions? Did the County apply this to the Jackson Casino project? Why or why not?

RESPONSE: Talk about a compound question. As stated in response number four we believe that the City would need a 24/7/365 law enforcement presence in the City. That would require seven deputies and one supervisor. This is an increase of 6.5 FTE total officers, above current level of service.

The rationale is straightforward. With as many people as the casino would likely attract coming to Plymouth around the clock it is only logical that you would want at least one officer on duty around the clock. The County has tried to apply this concept to the Jackson Casino. There are several factors that influence this in relationship to the Jackson Casino. The Jackson Casino is not in or immediately adjacent to a denser population area such as a city. The Jackson Casino is in a very rural area with few neighbors and no businesses. We have also not had the opportunity to apply this to the Jackson Casino in any meaningful way.

The need for seven officers and one supervisor is only for the City's needs. This does not include a component for responding to law enforcement needs of the casino itself. This is an almost impossible element to respond to at this point. We do not know if the casino plans to have its own security force, or how big that force would be. We do not know if the casino would have a tribal police force, or how big that would be. If the casino has a tribal police force will that force have federal police powers and therefore take their arrestees to the U.S. Marshal in Sacramento for incarceration or try to take their arrestees to the already over capacity Amador County Jail. If the casino does not have a tribal police force will it expect the Sheriff to respond to all criminal activity that occurs at the Casino?

8. What are the most commonly committed crimes and their related statistics?

RESPONSE: The most commonly committed crimes are drug use and possession and theft. The Sheriff makes an average of one hundred and five (105) felony arrests at the Jackson Rancheria Casino per year. Approximately ninety (90) of those arrests are for drug use and possession. The other approximately fifteen (15) are for theft. That is theft from the casino and theft from guests at the casino.

9. What are the crime statistics relating to the Jackson Rancheria and gaming/gambling in Amador County in general?

RESPONSE: The same as the answer to question eight. There is no gaming/gambling in Amador County except the Jackson Rancheria Casino.

10. Where are the emergency evacuation routes located on Highway 49 and the vicinity?

RESPONSE: State highways 49 to the north or to the south are the primary evacuation routes. If the evacuation heads south on hwy. 49 the evacuation can also then use highway 16 to the west. There are no other routes in the area that would support an evacuation. A south and west evacuation would have good roads to travel. A north evacuation would have to travel north on hwy. 49 which is a narrow and very winding stretch of road, not really suitable to a large evacuation.

11. What are the future planned police improvements in terms of staffing and infrastructure?

RESPONSE: At the present time there are no improvements planned. Due to the state budget crises we are in the opposite mode. The Sheriff has lost ten percent of the staff to budget cuts in the last two fiscal years. The Sheriff's Office is currently adding to the office space in the administrative

wing of the main Sheriff's Office in Jackson. We are also adding a new kitchen; laundry and sobering cell to the main jail at the Sheriff's Office in Jackson. Unfortunately none of this adds any bed space to the jail. The jail is always over capacity by ten to fifteen percent. Currently there are no plans to add any additional bed space to the jail.

12. What is the future projected staffing levels in terms of police to population ratios at planned buildout?

RESPONSE: Buildout of what? If you are referring to the Casino the desired staffing levels are articulated in response number four. However, this does not address the possible law enforcement needs of the casino itself. The needs of the casino have too many variables that are still not defined by the tribe's proposal to respond to intelligently.

Thank you for the opportunity to comment on the law enforcement needs of the City of Plymouth in relation to the proposed casino. Should you need any additional information please feel free to contact me.

Sincerely,

MICHAEL F. PRIZMICH
Sheriff / Coroner



Karl Knobelauch
Undersheriff

CC: County of Amador
file



C: MB
COUNTY OF AMADOR
PROBATION DEPARTMENT

MICHAEL N. KRILETICH
Chief Probation Officer

255 New York Ranch Road
Quail Hollow Professional Center
Jackson, California 95642-2147

MARK J. GIANNINI
Deputy Chief Probation Officer

This memo is regarding the impact of the proposed Plymouth casino on the Amador County Probation Department. As of this writing, all of the 2003 statistical information has not been completed. The following information is based on impact from the current casino in 2002, prior to the current expansion.

In 2002, we prepared approximately eight (8) casino incident pre-sentence felony reports. These are the most serious cases which required extensive investigation and report preparation. The average time for a probation officer to do a report, including support staff time and court time, is eight (8) hours. There is additional time for monitoring the case if the defendant is placed on probation. This time varies depending on the residence of the defendant, the severity of the case, and the needs of the defendant.

There were other felony cases settled without a report and numerous misdemeanor cases, but we have not developed a way to track them as we only get orders of probation from the court. These orders do not specify where the crime occurred. They do require some level of monitoring depending on the above-mentioned reasons.

Our Proposition 36 caseload (the Substance Abuse Crime Prevention Act of 2000 concentrating on treatment for drug offenders), had more than fifty-five (55) participants in 2002. Of those cases twenty-six (26) were from the casino. The drug diversion cases totaled one-hundred-three (103) 2002, with fifty-two (52) being from the casino. The preparation of these report takes about 1.5 hours. The supervision of the Proposition 36 is labor intensive due to the nature of treatment versus incarceration. This activity affects the staff of Alcohol and Drug Services as well as probation staff.

Another casino in Plymouth or elsewhere in the County will adversely impact our department; however, it is difficult to say what that impact will be until it happens. Presently, I feel safe in saying the casino cases require the attention of the equivalent of one full-time deputy probation officer. This includes all staff involved (DPO and clerical), the cost of drug testing, the cost of supervision services, and the cost of a vehicle, and other overhead. This estimate is frightening in light of the proposed and unanticipated cuts our department will receive as a result of the State's budget crisis. In other words, there will be fewer probation officers to monitor accountability standards of a growing caseload. This is not a safe situation for our community.

The current cost of a permanent DPO II (including salary, overtime and benefits) is \$83,400.

February 5, 2004

Michael N. Kriletich, Chief Probation Officer



AMADOR COUNTY UNIFIED SCHOOL DISTRICT
AMADOR COUNTY OFFICE OF EDUCATION

SUPERINTENDENT
Mike Carey

July 30, 2004

Patrick Blacklock
Amador County Administrator
Jackson, California

Dear Pat;

In addition to the answers to the three questions asked by the U.S. Department of the Interior/Bureau of Indian Affairs, here is other information regarding the impact on schools of another casino in Amador County.

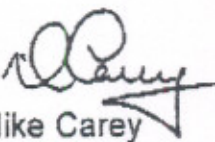
As you know, there was an initial written agreement drafted between the City of Plymouth and the casino developers that called for \$100,000 annually to go to the K-6 Plymouth Elementary School. Although the school and the school district had no role in developing that agreement –and the annual \$100,000 contribution subsequently, arbitrarily was pulled from that agreement –it gives some indication of the recognition of the tremendous impact such a casino would have on our school system. And as we pointed out to the Plymouth mayor at that time, it did not take into account the impact on schools in grades 7-12 as well.

Our July 2004 facilities master plan study, conducted by an outside resource, shows that we will have increased enrollment in the coming years and we will not have the facilities to house that increase. The study looked only at future residential developments and did not take into consideration the increased student enrollment that would be generated by a casino. This much we do know: (1) the current Jackson Rancheria casino is, by far, the largest employer in Amador County and (2) by itself, it has a significant impact on school enrollment, independent from developments. In fact, recently our transportation system serving the Rancheria has been impacted to the point where large numbers of students have to be dropped off at school sites well before school starts. Only through an arrangement with the casino and its tribal committee, where an adult monitor will be provided to supervise these students, was this potentially costly problem resolved.

Thus, this illustrates the impact of any large company on our schools, an impact we fear would be greater than any significant residential development. First of all, even for a large company, there are very small developer or impact fees on the facility itself; with a casino, there are none. Secondly, for us to monitor casino employee residences (in- or out-of-Amador County) will be costly. Finally, the impact will be felt not just on our regular classroom space but in many other areas of service we provide to students: transportation, playground space, after-school activities, special education programs, etc..

We can not put an exact price tag on another casino. We could say, with some justification, that it could be the cost of another elementary school (including the property) and, possibly, a portion of another junior high/middle school and high school. However, the bottom line is this: we will be seriously impacted by such a development.

Sincerely,



Mike Carey
Superintendent

Cc: Supervisors Mario Biagi, Richard Forster



AMADOR COUNTY

Unified School District

Office of Education

TO PATRICK BLACKLOCK, Amador County Administrator
 FROM MIKE CAREY, Amador County Schools Superintendent
 DATE JULY 23, 2004

- Students in the City of Plymouth attend Plymouth Elementary School (K-6), Lone Junior High School (7-8 grades) in Lone and Amador High School in Sutter Creek.
 - The District has a long history of allowing intradistrict agreements for students to attend schools within the district boundaries if there is room. Thus, there is an 'open enrollment' within the county.
- The current capacity and enrollment of all Amador County schools shows the following:

School	capacity	current enrollment	5-year projected
Lone Elementary	500	509	567
Jackson Elementary	400	429	467
Plymouth Elementary	200	201	201
Pioneer Elementary	250	247	249
Pine Grove Elementary	300	296	316
Sutter Creek Elementary	375	386	492
Lone Jr. High	500	509	531
Jackson Jr. High	350	383	396
Amador High School	750	882	767
Argonaut High School	675	678	783

Notes on the above numbers: EACH of the schools is well beyond capacity, but has covered these numbers by adding several portable classrooms at each site over the years. HOWEVER, the biggest concern is the impact on the sites, not just the classrooms. Most of these schools were built or rebuilt on parcels that are far, far below the state-recommended acreage for an elementary school, junior high school, high school, etc.. For example, at Pine Grove Elementary School the district 'rents' playground space from the Bureau of Land Management to provide a minimal area of space available to current enrollment. —and, still, this site is at about 60% of what the state would consider a minimum (10 acre) site.

The above numbers are based on a five-year facilities master plan just completed (July 2004) by Government Financial Strategies, Inc, of Sacramento. *The report shows that the district enrollment will continue to grow steadily over the next five years. It took into consideration many of the planned subdivisions and housing developments within Amador County over this time.*

- Site expansions and new sites are currently being considered. The master plan report will be the basis for the following considerations:
 - a new elementary school in the Sutter Creek area.
 - a new junior high school that would serve all county 7-8 graders.
 - a new high school that would serve all county 9-12 graders.
 It is fully expected that the elementary school will be an absolute necessity, as will one of the two other options —a new junior high or a new high school. In either case, that school

(junior high or high school) would be located in the Martell-Sutter Ridge area or nearby, for centralized services.

Additional facilities are being added at Lone Jr. High School and Argonaut High School at this time. Unlike most high schools that have two gymnasiums or multi-purpose rooms, Amador and Argonaut High Schools currently have only one each.

*The five-year facilities master plan is available at the ACUSD office.

DEPARTMENT OF FORESTRY AND FIRE PROTECTION

2840 Mt. Dana Road
Camino, California 95709
Website: www.fire@ca.gov
(530) 644-2345



July 21, 2004

Mr. William Allan
Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Re: EIS Ione Band of Wiwok Indians Fee-to Trust Project

Dear Mr. Allan,

The California Department of Forestry and Fire Protection (CDF) has the responsibility to provide fire protection for wildland fires within the State Responsibility Area (SRA). The proposed Fee-to Trust Project in the Plymouth area is currently within the SRA and we would respond to all wildland fires within the SRA. In addition, CDF responds, through the local mutual aid system, to any emergency incidents requiring a fire response. The Amador-El Dorado Unit also has a contract to provide fire protection in Amador County during the non-declared fire season. If this property becomes Trust lands CDF has an agreement with the Bureau of Indian Affairs (BIA) to provide wildland fire protection for BIA lands. I must stress that this agreement is for wildland protection only.

Currently there are only volunteer fire departments that provide fire protection, respond to medical aids and vehicle accidents in Amador County. Historically the volunteer system has worked well in delivering fire protection services in Amador County's rural areas with limited commercial and industrial development. If the proposed project is similar to the existing gaming casino in Amador County and other casinos throughout California, there will be a need for additional fire protection services to serve this facility.

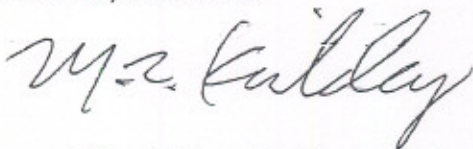
I would recommend that a fully staffed (minimum of 3 person staffing, 24/7) and equipped fire department be required to serve this facility, and to participate in the mutual aid system, to fully mitigate the impacts for fire protection this project would have in Amador County. I would recommend that a consultant that specializes in fire protection services prepare a written plan to determine adequate facilities, specialized equipment and staffing needs based on the type of development that will be associated with this project.

Mr. William Allan
July 21, 2004
Page Two

If you have any questions regarding this matter, feel free to contact me for additional clarification.

Sincerely,

Bill Holmes, Unit Chief

A handwritten signature in cursive script that reads "Mike Kirkley".

By: Mike Kirkley, Division Chief
Amador- El Dorado Unit
Pine Grove Camp
P.O. Box 405
Pine Grove, CA 95665
(209) 296-7591

cc: Jim McCart – Amador Fire Protection District
Patrick Blacklock – Amador County CAO
Amador County Board of Supervisors