

LETTER 10 (LOG # A010)

Port of Ridgefield



COMMISSIONERS
Joe Melroy
Roy Randel
Bruce Wiseman

EXECUTIVE DIRECTOR
Brent Grening

July 12, 2006

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Mr. Stanley Speaks
Regional Director
Bureau of Indian Affairs
Northwest Regional Office
911 NE 11th Avenue
Portland, OR 97232

RESOURCE COMPLIANCE
Bureau of Indian Affairs - NWRO

BUREAU OF INDIAN AFFAIRS
NORTHWEST REGIONAL OFFICE
911 NE 11TH AVENUE
PORTLAND, OREGON 97232

RE: Port of Ridgefield Official Comments on the Draft Environmental Impact Statement (DEIS) for the Cowlitz Indian Tribe Trust Acquisition and Casino Project

Dear Mr. Speaks:

The Port of Ridgefield is pleased to submit its official comments on the Draft Environmental Impact Statement (DEIS) for the Cowlitz Indian Tribe Trust Acquisition and Casino Project. These comments were prepared by Port of Ridgefield staff and were reviewed and approved on motion action by the Port of Ridgefield Commission at a publicly noticed meeting for submittal to you on July 14, 2006. Please note for the record that the Port of Ridgefield has not taken any official action either in support or opposition to the Cowlitz Indian Tribe's proposal.

For your information, the Port of Ridgefield is a special purpose municipal corporation formed in 1940 for the purposes of economic development within the port district. Currently the population of the Port District is approximately 13,000 individuals. Over the next twenty years the population is expected to exceed 38,000.

The proposed location and alternative site for the Cowlitz Indian Tribe Trust Acquisition and Casino Project is located within the port district boundaries of the Port of Ridgefield.

A010-1

The Port of Ridgefield recognizes that the project, if approved and constructed, will be operated by a federally recognized Native American Indian Tribe and that the project site will have sovereign nation status. The Port of Ridgefield believes that it is important for the Cowlitz Indian Tribe to be cognizant and respectful of the legitimate concerns of the citizens and residents of the surrounding cities and unincorporated areas that will be most immediately impacted by the project, if approved and constructed.

Whereas the Cowlitz Indian Tribe has also entered into a Memorandum of Understanding with Clark County whereby it agrees to compensate Clark County and local districts on a biannual basis in lieu of property taxes for revenue lost due to the removal of land from the tax assessment rolls. The Port of Ridgefield encourages the Cowlitz Indian Tribe to take proactive steps now and in the future to appropriately address the concerns of area citizens and to assist local governments, including the Port of Ridgefield, in adequately mitigating any and all project impacts should the project be approved and constructed.

A010-2

Specific to the Transportation/Circulation, Traffic From Other Projects portion of the DEIS, the Port of Ridgefield makes note of the following concerns and comments. The Port of Ridgefield comments are applicable to Alternatives A, B, C, D, E:

On page 4.8-7 of Section 4.8 (Environmental Consequences – Transportation/Circulation) under the title Traffic From Other Projects, the DEIS identifies three (3) development projects in the City of Ridgefield that are in process (with approvals but not yet occupied or with currently pending applications) that are anticipated to be completed by the 2010 project build-out target year. The projects named in the DEIS include, the Union Ridge Mixed Use Development, the Timmen Road (sic – Timm Road) Industrial Park and the Bellwood Heights residential subdivision.

A010-3
A010-4

The City of Ridgefield notes that in addition to these listed projects there are currently total thirty-eight (38) additional residential and non-residential projects that are in process, under review or proposed and all are expected to be complete or nearly complete by the 2010 target year. The City of Ridgefield notes that these projects include residential projects totaling over 2,000 residential lots and approximately 13 non-residential projects ranging from 6,000 square feet to over 150,000 square feet in size. The Port of Ridgefield is in the process of developing a seventy-five (75) acre commercial and industrial business park known as Discovery Pointe Corporate Park. Therefore the Port of Ridgefield requests that the FEIS be revised to contain information regarding these additional projects and that all necessary revisions to all relevant aspects of the transportation/circulation analysis contained in the DEIS be addressed in the FEIS inclusive of the identification of all appropriate and necessary mitigation measures.

In reference to Section 4.8.2 beginning on Page 4.8-10 and continuing through Section 4.8.6 ending 4.8-36 the Port of Ridgefield notes that the City of Ridgefield's 2005 comprehensive Plan and Transportation Capital Facilities Plan adopted on September 22, 2005 identifies a number of controlled intersections throughout the SR 501 (Pioneer Street) corridor including 65th Avenue, South 56th Place, 51st Avenue, 45th Avenue and 35th Avenue. The Port of Ridgefield notes that the Washington State Department of Transportation (WSDOT) and the City of Ridgefield have mutually agreed that each of these intersections will be controlled with multi-lane roundabouts. In addition, the City and Port of Ridgefield note that each of these intersections are currently in various stages of design and are anticipated to be constructed prior to 2010. The DEIS only analyzes transportation impacts on 65th Avenue and 45th Avenue. The Port of Ridgefield requests that the FEIS analyze all of the above referenced intersections as well as the entire SR 501 corridor, addressing how each site alternative would impact the transportation network. The Port of Ridgefield also requests that the FEIS identify appropriate mitigation measures based on a revised transportation analysis of this type.

A010-5

The Port of Ridgefield notes that the Traffic Impact Study indicates that 91 percent of visitors to the proposed project site for Alternatives A, B, C, and D located immediately west of 319th Street/Interstate 5 interchange will come from within the Portland-Vancouver metro area. However, the trip distribution analysis and trip assignments for Alternatives A, B, C, and D do not assign any trips originating from the Portland-Vancouver metro area to the NW 269th Street/Interstate 5 interchange, the NW Pioneer Street Corridor west of the interchange to North 45th Avenue, and North 45th Avenue corridor. The Port of Ridgefield believes there will be significant use of these roadways as an alternative access to the project site for the referenced alternatives, as workers and others attempt to avoid possible delays or congestion at the NW 319th Street interchange. The Port of Ridgefield requests that the FEIS either confirm the trip distribution and trip assignment numbers with more substantive analysis or present revised trip distribution analysis and trip assignment that specifies more conservative figures for the I-5/SR 501 interchange and North 45th Avenue corridor.

A010-6

The Port of Ridgefield thanks the Northwest Regional Office of the Bureau of Indian Affairs for the opportunity to provide written comments on the Draft Environmental Impact Statement (DEIS) for the Cowlitz Indian Tribe Trust Acquisition and Casino Project. Please transmit to the Port of Ridgefield when available electronic and hard copy versions of the Final Environmental Impact Statement. Please contact Brent Grening, Executive Director of the Port of Ridgefield if you have any questions or need additional information. Mr. Grening can be reached at 360-887-3873 or bgrening@portridgefield.org.

Sincerely,

PORT OF RIDGEFIELD

D. Joe Melroy
Commission Chair

R. Roy Randel
Commissioner

R. Bruce Wiseman
Commissioner

