

***LETTER 17 (LOG # 17)***

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Joseph Volz, Attbar, Inc.

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Phone (360) 887-3580 - (503) 285-2594 - FAX (360) 887-3577

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5985 S. 6TH WAY  
RIDGEFIELD, WASHINGTON 98642

BUREAU OF INDIAN AFFAIRS  
NORTHWEST REGIONAL OFFICE  
OFFICE OF THE REGIONAL DIRECTOR

May 19, 2006

Post-It® Fax Note	7871	Date	6/7/06	# of pages	3
To	Mr. Stanley Spear	From	Joseph Vol		
Co./Dept.	U.S. Dept. of Int.	Co.	ATTBAR, INC.		
Phone #		Phone #	360-887-3580		
Fax #	503-231-2201	Fax #	360-887-3577		

Mr. James Cason, Associate Deputy Secretary  
Department of the Interior  
1849 C Street, NW  
Mail Stop 7229  
Washington, DC 20240

RE: Cowlitz Tribe/Barnett-Mohegan Gambling Corporation in Clark County, Washington

Dear Mr. Cason:

As a business owner and resident of Ridgefield, Washington, I would like to formally comment on the proposal to build a large, class III casino in North Clark County, Washington. I am strongly opposed to such a development, and I question how forcibly imposing large scale gambling on a small, non-tribal community can possibly be a valid function of the United States federal government.

017-1

Large scale gambling leads to increased crime, and as a business owner and resident of North Clark County, this is one of my primary concerns. According to a study conducted in Atlanta on the effects of a casino five years before and after it was developed, there were major increases in crime within 30 miles of the casino. Total Crime increased by 107% - Violent Crime increased by 33% - Burglary 15.8% - Larceny 179.1% - Vehicle Thefts 51.6% - Robbery 86.9% The Draft Environmental Impact Statement submitted by the Cowlitz Tribe fails to adequately address the issue of crime.

017-2

The Cowlitz proponents call the casino a "win-win" opportunity, but Clark County is not a depressed area and will not benefit economically from a casino. The only reason the Cowlitz want to locate a casino in Clark County, rather than in their historical territory along the Cowlitz River, is the proximity to a larger population center. This will not be a "destination" casino, and Clark County will not benefit from increased tourism. The Cowlitz are simply attempting to "raid" Clark County and the Portland metropolitan area through a casino that will funnel millions of dollars out of our communities and into the pockets of already wealthy individuals in Seattle and Connecticut. I am hoping that your office will agree that Clark County needs protection from this kind of "opportunity."

017-3

According to the City of La Center, a large class III casino will have a significantly negative impact on that city's tax revenue and would result in increased taxes for those residents. The DEIS failed to address, in almost every way, the trajectories of loss to areas businesses resulting

017-4

Mr. James Cason, Department of the Interior  
May 19, 2006  
Page 2

from loss of tourism dollars, disposable income spent at the gambling facility, inability of area businesses to compete with tax and policy advantaged tribal businesses, and other county-wide losses that will be suffered if the casino project were to move forward. The DEIS fails to note the high tax rates for counties that host these types of facilities and, additionally, fails to completely address impacts from increased taxes to fund infrastructure costs that would arise from this development. The draft environmental study also fails to address negative impacts arising from decreased residential property values which invariably occur in connection with this type of development. The DEIS needs to be redone to reflect county-wide tax impacts, as well as those relative to specific towns.

017-4  
Cont.

The DEIS fails to address the negative social impacts to the residents of all cities within a ten mile radius, which includes Ridgefield. The cost of problem gambling, which would be borne by taxpayers, has not been addressed. Also, the study failed to consider school taxes and school crowding that would likely result in the communities where the low-wage employees of the casino would live, including Battleground, Woodland, La Center and Ridgefield. The DEIS fails to address severe impacts to all local schools, yet cites having a MOU with the Ridgefield school district. This MOU only mitigates impact fees arising from any residential units built by the tribe. Impact fees do not begin to cover the cost of schools and infrastructure required to support development; and since the investors initially proposed a strictly commercial development, and then, only to gain governance status on the land, added the 25 tribal housing units, the Ridgefield MOU has very little value or merit. The development driven impacts to the area schools such as traffic, crime, rapid influx of multifamily housing, loss of tax revenue, need to be evaluated.

017-5

Traffic is another major concern for me as a business owner. The DEIS did not adequately address the financial impact of slower commerce routes given the severe impacts to traffic patterns on I-5, which is one of the most significant commerce routes in Washington State. My company ships truck loads of product to Seattle every day, and we receive much of our raw materials and supplies from the Portland area. The DEIS also failed to address design capacity of the Glen Jackson and I-5 bridges, both of which cannot handle the additional traffic. The DEIS needs to address and properly mitigate the negative impacts on I-5 and I-205 traffic.

017-6

One of the standard arguments for allowing a tribe to operate a casino is tribal poverty. However, I have read that the Cowlitz tribal members are not economically disadvantaged. I urge a review of the economic status of the Cowlitz tribal members compared to non-tribal citizens of the same age groups. If the Cowlitz are well integrated into their communities and have income levels on par with their non-native neighbors, what basis is there for allowing them to open a mega-casino in my neighborhood? Even if the Cowlitz were an impoverished tribe, it would make more economic sense for the tribe to locate a "destination" casino in their historical territory along the Cowlitz River to provide jobs for the tribal members who live there.

017-7

017-8

Mr. James Cason, Associate Deputy Secretary  
Department of the Interior  
May 19, 2006  
Page 3

The DEIS failed to adequately address alternative locations as required by the NEPA, and the alternatives listed on the DEIS do not appear to follow the NEPA procedures. This concerns me specifically because Ridgefield maybe considered an alternate, or even perhaps a preferred site to the La Center location. If the tribe were allowed to develop a casino at a Ridgefield location, those residents, who are largely unaware that the DEIS lists Ridgefield as an alternative, would suffer impacts from crime, increased taxes, decreased property values and loss of existing hospitality and entertainment venues. The DEIS should be revised to include alternatives such as developing on existing tribal lands, (e.g. the Quinault or Chehalis reservation) or on trust lands in Toledo, WA. None of these options were explored, in spite of the majority of the Cowlitz tribe being located at those areas. Legal and appropriate alternatives must be studied and should include alternate industry or facilities located closer to the tribal population (rather than further away) so that members could actually work at said facilities or participate in management.

017-9

I am requesting that the DOI insist on fair standards for decision-making and conduct an independent evaluation of the tribe's restored lands request. The effect of the restored lands determination is too critical far-reaching for such decisions to be made without proper disclosure and open, public review.

017-10

Respectfully Submitted by:

*Joseph Volz*

Date: 05/19/06

Joseph Volz

Address:

5985 South 6th Way

City:

Ridgefield

STATE:

WA

ZIP:

98672

cc: Representative Brian Baird  
Senator Maria Cantwell  
Senator Patty Murray  
Senator John McCain  
Representative Richard Pombo  
Governor Chris Gregoire  
Attorney General Rob McKenna