

***LETTER 18 (LOG # 51)***

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Vancouver Housing Authority



VANCOUVER HOUSING AUTHORITY

August 16, 2006

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

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

Re: Cowlitz Draft EIS Comments

Dear Mr. Speaks:

Thank you for the opportunity to comment on the above referenced draft environmental impact statement (DEIS). By way of introduction, I am the CEO of the Vancouver Housing Authority, which since 1942 has provided low income and affordable housing through much of Clark County. The VHA has agreements in place with Clark County government and many cities, including the City of Ridgefield, to provide housing and services to low income citizens.

The socio economic element of the DEIS has been reviewed in detail by the Board of Commissioners of the Vancouver Housing Authority (VHA) and is found lacking in several key areas. Speaking on behalf of the Board, I especially note that a full and complete disclosure of the primary and secondary impacts upon housing, both availability and affordability, is not sufficient.

51-1

The VHA requests that the DEIS be amended with a supplemental DEIS before it is finalized to enable further public comment and public disclosure. We also ask that the following issues be addressed in the supplemental DEIS as follows:

**Primary Housing Impacts**

- The DEIS socio economic element relies heavily upon the assumption that 90% of the employees of the Cowlitz Tribal (Tribe) enterprises will be drawn from the local labor force, thereby minimizing direct housing impacts. Data available from other similar tribal enterprises would suggest local labor force participation could be as low as 75%, more than doubling the estimated housing demand from 300 dwelling units to an order of magnitude of up to 1,000 dwelling units. Because future forecasts of local labor participation are highly uncertain, we would recommend the supplemental DEIS *should instead assume a wider range of local labor market participation from 75% to 90%, thereby causing tribal*

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*enterprise managers to recruit 10-25% of the workers from outside the area. In turn, the housing impacts caused by recruiting a greater number of workers will have a proportionate impact on housing demand which needs to be quantified and disclosed in the DEIS. Housing impacts that cannot be absorbed by market forces need to be mitigated by the Tribe in a responsible manner, as described below.*

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- In addition, *the impact of housing demand created by construction workers and specialty contractors should be more thoroughly addressed in the DEIS.* Proxies for this estimate would include the recently constructed Hilton Hotel owned by the City of Vancouver in Downtown Vancouver as well as Legacy Salmon Creek Hospital; both commercial construction projects are similar to the proposed casino and were completed in the last 18 months. The housing impacts of the construction phase of the development should be mitigated by the Tribe in a responsible manner, as described below.

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### Secondary Housing Impacts

- *The DEIS does not adequately address the secondary impacts on housing due to the yet to be enacted expansion of the urban growth boundary (UGB) by Clark County which is necessary to serve the casino and hotel/retail complex with sanitary sewage treatment and other urban services.* Depending on the size of the UGB expansion and the adequacy of sanitary sewage treatment capacity in the vicinity, the indirect impacts could far outweigh the direct impacts described above. A large UGB expansion will create several parasitic developments, which would not otherwise be possible without approval of the proposed action to build the casino complex. Federal regulations stipulate that direct and indirect impacts are germane and shall be addressed in the context of the DEIS. The current analysis of indirect or secondary impacts is clearly inadequate. This new recommended and expanded approach will require an evaluation of the population impacts created by pending urban growth boundary amendments by Clark County government. From this evaluation the DEIS should impute housing demand by household type (single family and multiple family housing types) and all socio economic groups by income quartile (a proxy for very low income, low income, moderate income and median income).

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### Mitigation to Primary and Secondary Housing Impacts

- *The Payment in Lieu of tax (PILOT) agreement between the Cowlitz Tribe and Clark County government should be amended and expanded to include both a monitoring function and triggers to automatically increase PILOT payments to Clark County when impacts exceed the mitigated level.* This revised and expanded PILOT agreement would necessitate annual evaluation of the impact of Tribal business enterprises on housing demand and affordability (primary impacts) as well secondary impacts created by expansions of the UGB to accommodate the tribal enterprise (secondary impacts described above). The agreement's trigger(s) should be based on baseline data presented in the supplemental DEIS as agreed by Clark County in consultation with housing

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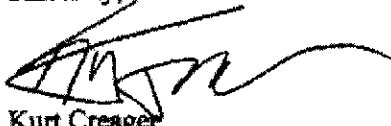
experts. The PILOT agreement would be the basis to capitalize a housing trust fund to mitigate the housing impacts created by the economic activities of the Tribal enterprises. Clark County government has prior experience in administering such funds to meet federal, state and local housing priorities. Therefore, the Tribe's capital contributions need not pay a significant sum for creation of a new bureaucracy.

- *In the event that additional affordable housing is needed to mitigate housing impacts created by the Tribal Business Enterprise, the Vancouver Housing Authority, with financial assistance from the Cowlitz Tribe or their business partners, is available to assist in the administration of a housing program, or to assist in the creation and management of a Housing Trust Fund, as appropriate.*

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I appreciate the opportunity to comment on the DEIS and ask that the consultants or sub-consultants engaged in this assessment contact the Vancouver Housing Authority if you have any questions or comments. The VHA Board of Commissioners does not have a position in support or in opposition to the casino, but we do want to ensure a full and rigorous disclosure and analysis of the housing impacts and mitigation measures of this significant development is provided for public discussion.

Sincerely;



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Visit us on the web at [www.vhausa.com](http://www.vhausa.com).

KC/sac

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VHA Board of Commissioners



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