

LETTER 26 (LOG # 366)

Woodland Chamber of Commerce



WOODLAND CHAMBER OF COMMERCE
PO BOX 1012
WOODLAND, WA 98674
Phone: 360-225-9552 Fax:360-225-3490

RECEIVED

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

July 10, 2006

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

RE: Comments on the Cowlitz Tribe's Draft Environmental Impact Statement

Dear Mr. Speaks,

On December 9, 2004 our organization, The Woodland Chamber of Commerce, wrote to your office and shared our sincere gratitude for the announcement of the upcoming Draft Environmental Impact Statement (DEIS) and the opportunity to comment during the scoping period.

It is with great concern that I write to you today with our comments on the Cowlitz Tribe's DEIS. As we clearly stated in our previous letter, (copy attached) our concerns are sincere and well founded with regard to the proposed casino. We took the time to study and detail them for you and we are most troubled to find that nearly all of our suggestions have been ignored.

Here are a few of the items we expressed concern over during our original scoping remarks.

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- Fully analyze the economic effects on Woodland's existing businesses. Restaurants, gas stations, hotels, stores and other businesses cannot compete with similar enterprises operated and located on tax and regulation free trust land.
- Full disclosure of all future business and expansion plans.
- An agreement with not only the County, but with local municipalities as well.
- Explore alternative sites that are located out of the immediate area, including other locations where there may be willing host communities for a casino resort.
- Traffic impacts to the Woodland community must be studied and addressed.
- Socio-Economic impacts to the Woodland community that will have a strong influence over the quality of life we value greatly must be researched.

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It is quite obvious that the DEIS fails to consider and discuss these and other potential adverse impacts within the Woodland Community.

The Woodland Chamber of Commerce is in agreement with the Greater Vancouver Chamber of Commerce, The Battle Ground Chamber of Commerce and the North Clark County Chamber of Commerce, all of whom have voted to oppose this proposed development. This is not the location for one of the biggest casinos in the country. Irrevocable damage will occur to our business community and our present quality of life.

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We strongly urge you to require the issuance of a supplemental DEIS upon which additional public review can be based, and the concerns within the community of Woodland can be addressed.

In closing, I would like to thank you on behalf of our 253 members for your consideration of these comments. Please contact the Woodland

Chamber of Commerce if you have any questions with regard to the
comments provided in this letter.

Very truly yours,

A handwritten signature in cursive script that reads "Deborah S. Kennell". The signature is written in black ink and is positioned above the typed name.

Woodland Chamber of Commerce President
Deborah S. Kennell



WOODLAND CHAMBER OF COMMERCE
 PO BOX 1012
 WOODLAND, WA 98674
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December 9, 2004

Ms. June Boynton
 Environmental Protection Specialist
 U.S. Department of the Interior
 Bureau of Indian Affairs
 911 N.E. Eleventh Avenue
 Portland, OR 97232-4169

RE: Cowlitz Tribe proposed trust or reservation land status for 152 acres located at exit 16 in Clark County, Washington

Dear Ms. Boynton:

On behalf of the 211 members of the Woodland Chamber of Commerce, I want to express our gratitude for the environmental impact statement (EIS) being done on this development and for our opportunity to submit scoping comments. We believe that this is a direct result of the many letters, including ours, requesting an EIS and again thank you. The proposed site is zoned for agriculture and is located within 2 miles of the Ridgefield National Wildlife Refuge, less than one mile of the east fork of the Lewis River, the only un-dammed river in the state of Washington. Currently there is a building moratorium at that location. The area in question is within 5 miles of Woodland, WA. and with the new information on what this development will include (restaurants, hotels, gas stations and retail stores) Woodland WA has become a major player in this issue because of the substantial impact it will have on our community.

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As such the EIS needs to address the following concerns:

- It is not enough for the Tribe to deal with the County. There needs to be an agreement with the affected municipalities, including Woodland, Ridgefield and LaCenter, WA.
- Any draft EIS must provide full disclosure of the Tribe's plans, including any future plans for expansion.
- The draft EIS must explore alternative sites, including other locations where there may be willing host communities for a casino. That exploration should include seeking a location in the Cowlitz River valley. This would allow the tribe to eliminate all questions of indigenous history, dramatically reduce start up costs and speed up the start up time. This would also still allow the tribe to place their facility on the I-5 corridor.

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- The draft EIS must fully analyze the economic effects on Woodland's existing businesses. The only way to know if the effect will be adverse is to study and document all the taxes, permits and payroll laws that the tribal businesses and non tribal businesses located on their proposed development will pay compared to non-Indian businesses located in Woodland, Ridgefield and LaCenter WA, the three closest communities.
- The impact will be adverse if the playing field is not equal, we do not believe that it was ever intended to grant trust or reservation land status in areas that would destroy the economy of the existing businesses.
- BIA should explain what standards it uses to establish an "initial reservation." We are opposed to using such a designation for the principal purpose of building a casino and avoiding the requirements of section 20 of the Indian Gaming Regulatory Act.
- It is our position that the "no detriment to local government" requirement of section 20 applies. This requirement would prohibit a casino on this land unless, after consulting with the County and municipalities, the Secretary of the Interior determines the casino will not be detrimental to the local community, and this includes the business community. The Governor must concur.
- BIA must say now whether it agrees with our position that section 20 applies.
- We are concerned about the overall impact on the quality of life in this area. Construction of an Indian casino at exit #16 could have a series of environmental impacts that will have spillover effects to Woodland. Traffic, water quality, and similar problems all have to be addressed in the EIS, because if request is granted it will be beyond the ability of state and local governments to control.
- We also are concerned about the expansion of tribal lands through future trust acquisition requests that are likely to be forthcoming once the Tribe obtains a foothold in this area.

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If you have any questions regarding these comments, please feel free to contact me. Thank you for considering these concerns.

Very truly yours,



Mike Schouten, Vice President & President Elect
On behalf of our 211 members of the Woodland Chamber of Commerce

CC:

Gale Norton
Secretary of the Interior
1849 C Street N.W.
Washington, DC 20240

Mark Brown
Mohegan Tribal Chairman
1 Mohegan Sun Blvd.
Uncasville, CT 06382

Stanley Speaks
Regional Director
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Michael D. Olsen
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1849 C Street, NW
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750 Anderson Street Suite B
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