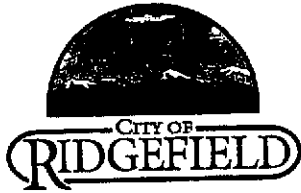


LETTER 6 (LOG # A006)

City of Ridgefield



Gladys Doriot, Mayor
Gary Adkins, Council Member
Chad Sessions, Council Member
David Standal, Council Member
Scott Hanson, Council Member

July 13, 2006

RECEIVED

JUL 14 2006

Stanley Speaks
Regional Director
BUREAU OF INDIAN AFFAIRS
Northwest Regional Office
911 NE 11th Avenue
Portland, OR 97232

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

RE: City 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 City 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 City of Ridgefield staff and City consultants and were reviewed and approved on motion action by the Ridgefield City Council at a publicly noticed meeting held on July 13, 2006 for submittal to the Bureau of Indian Affairs. Please note for the record that the City of Ridgefield City Council has not taken any official action either for or against the Cowlitz Indian Tribe's proposal.

For your information, the City of Ridgefield is a rapidly growing community that was incorporated in 1909 and has an approximate population of 4,000 persons. We anticipate our population will be approximately 25,000 persons in 2024. We are also planning to have an employment base of approximately 20,000 jobs in 2024. The City of Ridgefield's current municipal limits are located approximately 1.5 miles southwest of the proposed location for the Cowlitz Indian Tribe Trust Acquisition and Casino Project. The proposed project site has a strong affinity to the Ridgefield community as well as being located within the established boundaries of the Ridgefield School District and the Port of Ridgefield and within the Ridgefield area zip code (98642) designated by the United States Postal Service.

The City 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 legally have sovereign nation status. The City 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 incorporated cities and unincorporated areas that will be most immediately impacted by the project, if approved and constructed. The City of Ridgefield encourages the Cowlitz Indian Tribe to take proactive steps now and in the future to appropriately address these concerns and to assist local governments, where appropriate, in adequately mitigating any and all impacts of the project, if approved and constructed.

The City of Ridgefield recognizes that one of the alternatives evaluated in the Draft Environmental Impact Statement (DEIS) is inclusive of 163.02 acres that is located within the current 20-Year Urban Growth Area (UGA) of the City of Ridgefield as established by the Clark County Board of County Commissioners on September 22, 2004. The City of Ridgefield understands that the inclusion of the 163.02 acres of land within the City of Ridgefield's current Urban Growth Area (UGA) is for purposes of analysis only. The City of Ridgefield understands that in order for Alternative E - Ridgefield Interchange Site to be considered beyond an alternative analysis location as required by the National Environmental Policy Act (NEPA), a new application to the Bureau of Indian Affairs would have to be made by the Cowlitz Indian Tribe for its approval of federal trust gaming authorization and reservation trust status inclusive of the possible production of a new Draft Environmental Impact Statement (DEIS). Therefore, any comments by the City of Ridgefield on Alternative E - Ridgefield Interchange Site should only be construed as responding to the information presented in the Draft Environmental Impact Statement (DEIS).

The following constitute the City of Ridgefield's official comments on relevant portions of the Draft Environmental Impact Statement (DEIS). Please note that the City's comments only address those issue areas that the City believes have or will have some level of impact on the City of Ridgefield:

GENERAL COMMENTS

The City of Ridgefield requests that a second revision DEIS and associated 90-day public comment period be provided following incorporation of comments on the current document prior to finalizing the Environmental Impact Statement.

A006-1

The City of Ridgefield strongly requests that, should Alternative E - Ridgefield Interchange Site become the preferred alternative at some future point, the Cowlitz Indian Tribe be required to submit a new application to the Bureau of Indian Affairs for approval of federal trust gaming authorization and reservation trust status inclusive of production of a new Draft Environmental Impact Statement with a 90-day public comment period.

A006-2

The City of Ridgefield believes that the Ridgefield National Wildlife Refuge is a valuable asset of the community. The City notes that the DEIS does not evaluate potential impacts to the Wildlife Refuge. Therefore, the City of Ridgefield requests that the FEIS address potential impacts to the Wildlife Refuge and the Pacific Flyway.

A006-3

Public Safety – Law Enforcement

Applicable to Alternatives A, B, C & E:

The DEIS notes multiple times that there is a correlation in increased law enforcement services demand and the opening of a casino based on nationwide studies and surveys. The DEIS specifies that increased calls for service included driving under the influence, personal robbery, credit card fraud, automobile thefts, disorderly conduct and assault. The DEIS notes that the increased calls for service and crime activity was attributed in large part to the increased concentration of people in the local area. The City of Ridgefield currently provides comprehensive police services within its municipal limits and provides back-up police services to other jurisdictions within the region including the Clark County Sheriff's Office, the City of La Center, the City of Woodland, the City of Battle Ground and the City of Kalama. The City of Ridgefield is concerned that the DEIS does not provide substantive analysis and discussion of how these Alternatives impact the operations of the City of Ridgefield Police Department including but not limited to personnel needs, equipment needs, shift requirements, training requirements and special skills needs. The City of Ridgefield is further concerned that the DEIS presumes that the only real impacts will be to the Clark County Sheriff's Office, even though the City of Ridgefield's current municipal limits are only approximately 1.5 miles south of Alternatives A, B and C and immediately abuts Alternative E. The City of Ridgefield requests that the Final Environmental Impact Statement (FEIS) contain a comprehensive analysis of all impacts to the City of Ridgefield's Police Department operations resulting from Alternatives A, B, C and E inclusive of any required mitigation measures to appropriately address identified impacts. The City of Ridgefield believes that the Cowlitz Indian Tribe should consider the provision of an agreed upon appropriate level of funding to off-set the impacts to the City's policing operations and fund operational needs necessitated by Alternatives A, B, C and E.

A006-4

A006-5

Land Use

Applicable to Alternatives A, B, C & E:

The City of Ridgefield notes that the general discussion of *Proposed Urban Growth Area Expansions* on Page 3.9-11 only addresses the proposed urban growth area expansion of the City of La Center, but does not address at all the proposed urban growth area expansion of the City of Ridgefield. The City of Ridgefield notes that Alternative E is located entirely within the City of Ridgefield's current (i.e. approved by the Clark County Board of County Commissioners in September 2004) Urban Growth Area. The City of Ridgefield requests that the FEIS contain a substantive discussion of

A006-6

A006-6
Cont.

the City of Ridgefield's existing and proposed urban growth area, particularly in relation to Alternative E.

The City of Ridgefield notes that the DEIS does not address the Intergovernmental Agreement executed in January 2006 between the Cities of La Center and Ridgefield pertaining to the identification of NW 299th Street as the dividing line between the two jurisdictions for future urban growth area expansions. The two Cities executed this Agreement to clarify for both Cities and Clark County that the City of Ridgefield's urban growth area expansions would extend north only to NW 299th Street while the City of La Center's urban growth area expansions would extend south only to NW 299th Street. The City of Ridgefield requests that the FEIS address this Agreement in the context of existing and future urban growth area planning efforts for the two Cities.

A006-7

Socio-Economic Conditions

Applicable to Alternatives A, B, C & E:

The City of Ridgefield notes that the DEIS does not contain substantive analysis of socio-economic impacts to the surrounding communities inclusive of the City of Ridgefield in the following areas:

- Impacts of non-affiliated casino employees inclusive of multiple family members and/or multiple non-related individuals living together – often referred to as “hot-bedding”
- Sense of place and sense of identity impacts for surrounding communities
- Mental health (e.g., depression, anger) impacts on surrounding communities
- Impacts on familial relationships in surrounding communities (i.e., casino and entertainment attractions versus participation in individual or collective family events)

A006-8

Transportation

Applicable to Alternatives A, B, C, D & E:

City of Ridgefield notes that analysis of transportation impacts in the DEIS does not appear to adequately address or analyze impacts along the Interstate 5 corridor between the Columbia River and Clark-Cowlitz County line, including but not limited to:

- WSDOT-operated truck weigh station as it relates to interaction between freight traffic and non-freight traffic
- Concurrent events at the Clark County Amphitheater and the proposed 5,000-seat auditorium at the proposed casino
- Interstate 5 bridge spanning the Columbia River

A006-9

WATER RESOURCES

Water Shed Setting

Applicable to Alternatives A, B, C, & D:

The City of Ridgefield requests that the FEIS confirm stormwater runoff quantities, and better define potential impacts of stormwater runoff from impervious surfaces and the downstream impacts to McCormick Creek.

A006-10

SOCIO-ECONOMIC CONDITIONS

Population

Applicable to Alternatives A, B, C, D & E:

On Page 3.7-4 under Section 3.7.2 within the subject area of Primary Population, the DEIS identifies a 2023 population for the City of Ridgefield of 11,447. On September 22, 2004, the Clark County Board of County Commissioners approved a 20-Year Urban Growth Area for the City of Ridgefield that would accommodate a 2024 population of 12,000. In March 2005, the Clark County Board of Commissioners re-opened the countywide comprehensive planning process and invited all jurisdictions within the County to submit revised 20-Year Urban Growth Area (UGA) proposals. Between March 2005 and September 2005, the City of Ridgefield engaged in substantive technical analysis and public involvement to evaluate the potential expansion of its 20-Year Urban Growth Area (UGA). On September 22, 2005, the City Council for the City of Ridgefield approved via ordinance action an update of the City of Ridgefield Comprehensive Plan and the City of Ridgefield, Sewer, Water and Transportation Capital Facilities Plans. These Plans forecast a 2024 population for the City of Ridgefield of approximately 25,000 persons and a 2024 employment base of approximately 20,000 jobs based on a significantly expanded 20-Year Urban Growth Area (UGA). The City of Ridgefield completed its update of its Comprehensive Plan and its Sewer, Water and Transportation Capital Facilities Plans in accordance with the initial timeframe set by the Clark County Board of County Commissioners. At this point, Clark County has not completed its environmental review and legislative decision-making process such that the City of Ridgefield can conclusively state what its ultimate 20-Year population and employment figures will be. However, the City of Ridgefield believes that the 2023 population projection for the City presented on Page 3.7-4 is incorrect.

A006-11

Since 1997, the City of Ridgefield has approved over 2,000 residential lots. Since 2004, the City of Ridgefield has experienced significant new residential construction. In 2004, the City of Ridgefield issued 206 new residential building permits and in 2005, the City issued 313 new residential building permits. The City of Ridgefield notes that Table 3.7-

A006-12

3 specifies that a total of one (1) new housing unit occurred in 2005 in the Ridgefield portion of the Primary Area as described in the DEIS. The City of Ridgefield is unclear as to how the DEIS interprets new residential units, specifically whether this Table addresses only those units that were built and occupied in 2005 or those units for which permits were issued, nevertheless the City of Ridgefield believes that the figure of one (1) new housing unit is incorrect and under-reports actual new housing units in the Ridgefield portion of the primary area. The City of Ridgefield also questions whether this figure accurately represents 2005 building activity in the unincorporated portion of the Ridgefield related primary area.

A006-12
Cont.

The City of Ridgefield anticipates issuance of 350 to 400 new residential building permits annually through 2010 that would add 941 persons to 1,076 persons to the City's population based on a ratio of 2.69 persons per household. The City of Ridgefield notes that the City of Ridgefield's population grew 21 percent in 2004. In 2005, the City of Ridgefield's population grew 22.5 percent as determined by the Washington State Office of Financial Management. In 2006, the City estimates that its population could grow by 24 percent. The City anticipates double-digit percentage population growth through at least 2010.

A006-13

The City of Ridgefield therefore requests that the Final Environmental Impact Statement (FEIS) address the following:

- Modify all population projections for the City of Ridgefield to be reflective of a much higher 2023 population and employment base for the City.
- Modify Table 3.7-3 to accurately 2005 residential building activity in the City of Ridgefield.
- Modify the EIS document as appropriate to accurately reflect the City's current and projected annual growth rates and estimated population increases.

Community Infrastructure – Clark County Schools

Applicable to Alternatives A, B, C & E:

The City of Ridgefield notes that the discussion of the Ridgefield School District expansions plans on Page 3.7-12 does not address the May 2006 bond election for the Ridgefield School District and the outcome of this election. The City of Ridgefield requests that the FEIS contain this information.

A006-14

The City of Ridgefield notes that the DEIS addresses impacts to the Ridgefield School District as being minimal due to the low number of employees that are expected to relocate and live in the boundaries of the Ridgefield School District. The DEIS notes that the Cowlitz Indian Tribe has entered into a Memorandum of Understanding with the Ridgefield School District to pay school impact fees if the Tribe constructs single or multi-family housing on land within the School District's service area. The Cowlitz Indian

A006-15

Tribe has also entered into a Memorandum of Understanding with Clark County whereby it agreed 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 City of Ridgefield notes for the record that the DEIS identifies that the executed Memorandum of Understanding is not applicable to Alternate E. The DEIS does not address in detail the anticipated financial impact to the Ridgefield School District, the value of the replacement monies to be paid to the School District and the measurement techniques to insure that the biannual payments to the School District reflect year to year increases in property value that would result if the property was not removed from the tax assessment rolls and developed for non-residential purposes as is planned by the City of La Center in its current Urban Growth Area (UGA) planning. The City of Ridgefield requests that the FEIS contain this information.

A006-15
Cont.

Indirect and Growth Inducing Effects - Socio-Economic Conditions

Applicable to Alternatives A, B, C & E:

On Pages 4.14-3 and 4.14-4 and 4.14-12 and 4.14-13 and 4.14-22 and 4.14-23, the DEIS identifies that the combination of new employees, assumed constant housing vacancies and market forces will cause the need for a range of 200 to 300 new residential housing units and associated non-residential development to support these units. The DEIS identifies that the average wage of employees under Alternatives A, B, C and E would be \$28,000. The City of Ridgefield requests that the FEIS present a minimum of four employment categories, the anticipated number of employees per category, and the average, median and range of annual salaries associated with each category.

A006-16

The City of Ridgefield's recent residential growth has primarily resulted in single-family residential development with average prices ranging from \$200,000 to \$300,000 as well as a significant number of higher end single-family residential units ranging in price from \$400,000 to \$700,000. To this point, the City has experienced limited multi-family residential development. Therefore, based on the identified average annual wage of \$28,000, the City of Ridgefield is likely to provide limited housing options for all but the professional management of the proposed Alternatives. The City of Ridgefield requests that this preceding information be addressed in the FEIS.

A006-17

The City of Ridgefield is also concerned that the DEIS has not adequately addressed potential impacts on housing vacancies and market forces resulting from the documented slowdown in the local, regional and national residential construction industry and the documented increase in interest rates. The City of Ridgefield requests that FEIS address the documented slowdown in the local, regional and national residential construction industry and the documented increase in interest rates and revise as necessary findings and conclusions initially presented in the DEIS.

A006-18

Impacts to Surrounding Property Values

Applicable to Alternative E:

The City of Ridgefield notes that the DEIS on Page 4.17-17 does not adequately analyze impacts to surrounding property values resulting from the construction of Alternative E. The DEIS identifies that there may be negative value impacts to nearby surrounding properties and that effects to the rural residential nature of some of these properties is potentially significant and unavoidable. The DEIS, however, specifies that the area around Alternative E is proposed to change from a rural land use character to more commercial and service economy land uses. The City of Ridgefield has planned and is currently planning for the area around the Ridgefield Interchange inclusive of Alternative E to be a source and location of significant economic development in the City during the next twenty years. The DEIS identifies that properties surrounding Alternative E may see increased property values because of speculation for commercial growth which the DEIS identifies as a beneficial impact, and therefore concludes, that no mitigation is required. The City of Ridgefield notes that the DEIS does not substantively analyze in any great detail the potential negative or positive impacts on property values, but rather concludes without adequate findings that positive property values will occur for surrounding properties as a result of Alternative E. The City of Ridgefield requests that the FEIS contain substantive detailed analysis inclusive of data collected from other areas in the country demonstrating the positive or negative property value impact result from the proposed operations of Alternative E.

A006-19

Proposed Mitigation Measures – Socio-Economic Conditions

Applicable to Alternatives A, B, C & E:

The City of Ridgefield requests that Proposed Mitigation Measure A under Section 5.2.6 of Pages 5-10 and 5-11 be revised to require the Cowlitz Indian Tribe to enter into joint marketing programs with all affected jurisdictions or governmental bodies including the City of Ridgefield to adequately mitigate for economic development impacts. Potential marketing programs may include advertising through various media avenues, signage, and participation in economic development-related forums. The City of Ridgefield notes that Alternatives A, B, C and E propose to have multiple dining outlets and bars/entertainment and significant retail space square footage. The City of Ridgefield's 20-Year Comprehensive Plan forecasts significant non-residential development providing a variety of commercial oriented services. The provision of the multiple dining outlets, bars/entertainment and significant retail square footage as proposed will significantly impact the City of Ridgefield's economic development efforts to encourage similar businesses to locate in and around the City, particularly at the City's interchange with Interstate 5. The development of these business types in the City of Ridgefield will provide significant retail sales tax to the City allowing the City to maintain and enhance levels of services for various public services. The City of Ridgefield is concerned that without joint marketing the City's ability to attract businesses and to encourage retail

A006-20

sales tax collection will be significantly and negatively impacted by Alternatives A, B, C and E.

A006-20
Cont.

Applicable to Alternative E:

The City of Ridgefield requests that Proposed Mitigation Measure B under Section 5.2.6 of Pages 5-11 be revised to require the Cowlitz Indian Tribe to enter into a separate agreement with the City of Ridgefield to make payments to the City of Ridgefield in lieu of property taxes, sales tax and hotel/motel tax that the City would have been eligible and able to receive following the annexation of the Alternative E site into the municipal limits of the City of Ridgefield. The Alternative E site is located in the current 20-Year Urban Growth Area (UGA) of the City of Ridgefield and has a future current zoning designation of Master Planned Business Park (MPBP). Following its annexation into the City of Ridgefield, the Alternative E site would be eligible for placement of the Employment Mixed Use Overlay (EMUO) designation that would allow for a mix of industrial, commercial and residential land uses within the boundaries of the site. The removal of the 163.02 acres from the City's 20-Year Urban Growth Area would significantly and negatively impact the City of Ridgefield's future public revenue capture from this land.

A006-21

Applicable to Alternative E:

The City of Ridgefield requests that a new Mitigation Measure be added under Section 5.2.6 of Page 5-11 requiring the amendment of the existing Memorandum of Understanding or an execution of a new Memorandum of Understanding specifying that Cowlitz Indian Tribe compensate the Ridgefield School District on a biannual basis or as agreed to by the School District in lieu of property taxes for revenue lost due to the removal of the 163.02 acres currently planned for non-residential land uses from the tax assessment rolls.

A006-22

LAND USE

Indirect and Growth Inducing Effects – Land Use

Applicable to Alternative E:

The City of Ridgefield notes that on page 4.14-23 the DEIS states that there will not be significant indirect effects to land uses occurring as a result of off-site residential and commercial development under Alternative E. The City of Ridgefield is concerned that the DEIS does not adequately address the types of housing or commercial development that are anticipated to occur around and in other parts of the City as a result of Alternative E, their consistency with the City's long range plans, the adequacy of the City's current policies to address these uses and the level of potential policy changes that the City of Ridgefield may need to conduct in the future to address the impacts of

A006-23

Alternative E on land use patterns surrounding the Alternative E site and in other parts of the City. The City of Ridgefield requests that the FEIS contain a more comprehensive analysis of indirect effects to land uses occurring as a result of off-site residential and commercial development under Alternative E based on the preceding issues identified by the City.

A006-23
Cont.

TRANSPORTATION/CIRCULATION

Traffic from Other Projects

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, including the Union Ridge Mixed Use Development, the Timmen Road (sic – Timm Road) Industrial Park and the Bellwood Heights residential subdivision. The City of Ridgefield notes that in addition to these listed projects there are currently a total of thirty-eight (38) additional residential and non-residential projects that are in process, under review or proposed and are expected to be complete or nearly complete by the 2010 target year. These 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 City of Ridgefield requests that the FEIS contain this information and that all necessary revisions to all relevant aspects of the transportation/circulation analyses contained in the DEIS be addressed in the FEIS inclusive of the identification of all appropriate and necessary mitigation measures.

A006-24

In reference to Section 4.8.2 beginning on Page 4.8-10 and continuing through Section 4.8.6 ending on 4.8-36 the City 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 City 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 notes that each of these intersections are currently in various stages of design and are anticipated to be constructed prior to 2010. The City has identified that the DEIS only analyzes 65th Avenue and 45th Avenue. The City of Ridgefield requests that the FEIS; analyze all of the previously referenced intersections as well as the entire SR-501 corridor addressing how all the Alternatives would impact the transportation network. The City further requests that the FEIS identify appropriate mitigation measures based on the previously stated analysis.

A006-25

The City of Ridgefield notes that the City's Transportation Capital Facilities Plan specifies the construction of a new overpass across Interstate 5 along NW 299th Street within the next twenty (20) years. The City of Ridgefield notes that the DEIS does not address the planned provision of the NW 299th Street overpass and the possible participation of the Cowlitz Indian Tribe in the construction of this overpass to mitigate anticipated impacts to the surrounding transportation system resulting from the proposed casino, entertainment, dining and retail land uses. The City of Ridgefield requests that the FEIS analyze the provision of the NW 299th Street overpass inclusive of how this overpass will impact anticipated traffic flows. The City of Ridgefield further requests that the FEIS analyze the participation of the Cowlitz Indian Tribe in the construction of the NW 299th Street overpass to mitigate traffic impacts.

A006-26

Applicable to Alternatives E:

The City of Ridgefield recognizes that Alternative E is not the preferred alternative and is presented in the DEIS for alternatives analysis purposes only. However, in the event Alternative E did ever become the preferred alternative and a new application to the Bureau of Indian Affairs was made, the City of Ridgefield would strongly advocate for requiring additional analysis pertaining to transportation impacts and mitigation as the DEIS does not contain accurate and current development information regarding in process development and upcoming major transportation improvements to the SR-501 corridor.

A006-27

Cumulative Effects

Applicable to Alternatives A, B, C, D & E:

On Page 4.15-3 under Section 4.15.1 (Introduction) specifically under the title *List of Related Actions and Projects*, the City of Ridgefield requests that the list of Development Projects be completely revised to fully identify all current and planned residential and non-residential development projects in the City of Ridgefield. Please find attached the most current version of a monthly development activity report prepared by the City of Ridgefield.

A006-28

Proposed Mitigation Measures – Transportation/Circulation

Applicable to Alternatives A, B, C, D & E:

The City of Ridgefield requests that a new Mitigation Measure be added under Section 5.2.7 of Page 5-11 requiring specifying the following mitigation measure for Alternatives A, B, C, D and E:

A006-29

- All work conducted within the City of Ridgefield will require the following for all Alternatives:

- Proposed changes to City facilities must be designed to the most current edition of the City of Ridgefield Engineering Standards for Public Works Construction and the Ridgefield Municipal Code.
- Plans must be reviewed and approved by the City of Ridgefield prior to beginning work.
- Engineering calculations, plans and reports submitted for review and approval must bear the seal and original signature of a professional engineer.
- Construction inspection will be performed by the City at the Tribe's expense.

A006-29
Cont.

The City of Ridgefield also notes that additional transportation mitigation efforts resulting from the additional analysis of all future controlled intersections along the SR 501 corridor and additional development activity may be necessary.

A006-30

— *Applicable to Alternatives A, B, C & D:*

The City of Ridgefield notes that the Traffic Impact Study indicates that 82 percent of visitors to the proposed project site for Alternatives A, B, C and D located immediately west of the NW 319th Street/Interstate 5 interchange will come from within the Portland-Vancouver metro area and south of the Ridgefield city limits. However, the trip distribution analysis and trip assignment for Alternatives A, B, C and D does 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 City of Ridgefield believes there will be significant use of these roadways as an alternate access to the project site for the referenced alternatives to avoid possible delays or congestion at the NW 319th Street interchange. The City 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 N. 45th Avenue route.

A006-31

WASTEWATER SERVICE

Applicable to Alternatives A, B, C, D & E:

The City of Ridgefield notes on page 4.10-22 under Section 4.10.5 titled *Wastewater Service* that, in the event the City of Ridgefield was asked to be a public wastewater purveyor for any of the alternatives, the City's planned outfall to the Columbia River would need to be completed. The City of Ridgefield requests that the FEIS contain this information.

A006-32

Applicable to Alternatives A, B, C and D:

The City of Ridgefield notes on page 4.14-10 under Section 4.14.3 entitled *Indirect Effects From Mitigation of Discharge of Treated Wastewater* that in the event an

A006-33

alternative to on-site wastewater treatment and disposal for Alternatives A through D is determined to be the preferred method of wastewater treatment and includes connection to the City of Ridgefield sanitary sewer collection system, additional investigations, analysis and mitigation efforts will be required not only at the City's wastewater treatment plant, but also likely within the collections system itself. The City of Ridgefield requests that the FEIS contain this information.

A006-33
Cont.

Applicable to Alternatives E:

The City of Ridgefield recognizes that Alternative E is not the preferred alternative and is presented in the DEIS for alternatives analysis purposes only. However, in the event Alternative E did ever become the preferred alternative and a new application to the Bureau of Indian Affairs was made, the City of Ridgefield would strongly advocate for requiring significant additional analysis, calculations and documentation pertaining to proposed sanitary sewer (wastewater) service within the City of Ridgefield, as the DEIS does not adequately address obtaining these services from the City of Ridgefield.

A006-34

Proposed Mitigation Measures – Wastewater Service

Applicable to Alternatives A, B, C, D & E:

The City of Ridgefield requests the Mitigation Measures specified in Section 5.2.8.F-H on page 5.15 and 5.16 pertaining to wastewater service impacts be revised to specify that any services agreement with the City of Ridgefield for the provision of municipal sewer service would require substantial increases in the City's current wastewater treatment plant capacity. The City of Ridgefield requests that these Mitigation Measures be further revised to specify that Cowlitz Indian Tribe would pay an appropriate portion of the City's costs to upgrade and expand its wastewater treatment plant inclusive of the cost of the City's planned extension of an outfall to the Columbia River.

A006-35

WATER SERVICE

Applicable to Alternative E:

The City notes that Section 4.10.5 on page 4.10-22 identifies that water service to Alternative E will be provided by Clark Public Utilities (CPU). The City of Ridgefield notes that while the site is currently within the CPU water service area, it is also within the City of Ridgefield's Urban Growth Area (UGA). The City's current and foreseeable water service policy is to be the sole provider of public water service within its existing and future city limits. The City of Ridgefield believes that as the City expands into its Urban Growth Area (UGA), it is likely that the City and CPU will negotiate changes in water service area or changes in City water service policy. The City of Ridgefield notes that it is possible that the City of Ridgefield will be the water service provider in the

A006-36

future for this site regardless of its use. The City of Ridgefield requests that the FEIS identify and discuss the preceding situation.

A006-36
Cont.

The City of Ridgefield recognizes that Alternative E is not the preferred alternative and is presented in the DEIS for alternatives analysis purposes only. However, in the event Alternative E did ever become the preferred alternative and a new application was made to the Bureau of Indian Affairs, the City of Ridgefield would strongly advocate for requiring significant additional analysis, calculations and documentation pertaining to proposed water service within the City of Ridgefield, as the DEIS does not adequately address obtaining these services from the City of Ridgefield.

A006-37

Applicable to Alternatives A, B, C, D & E:

The City of Ridgefield Notes that Mitigation Measure E in Section 5.2.8E (Public Services – Water Supply) on page 5.15 is in error. This Mitigation Measure specifies the provision of a pipeline connection of more than two (2) miles for all of the Alternatives would be required. The City of Ridgefield notes that City water service is available in proximity to Alternative E and as such, a two-mile pipeline connection is not necessary. The City of Ridgefield requests that Mitigation Measure E be revised to remove the reference to Alternative E.


A006-38

The City 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 City when available electronic and hard copy versions of the Final Environmental Impact Statement (FEIS). Please feel free to contact Justin Clary, P.E., Interim City Manager/Public Works Director if you or your staff have any questions or need additional information. Mr. Clary can be reached at 360.887.3557 or justin.clary@ci.ridgefield.wa.us.

Sincerely,

RIDGEFIELD CITY COUNCIL


Gladys Doriot
Mayor


David Standal
Mayor Pro-Tem/Councilperson


Gary Adkins
Councilperson


Scott Hanson
Councilperson


Chad Sessions
Councilperson

Enc.: City of Ridgefield Development Activity Report, June 2006

cc: Kay Kammer, City Clerk/Chief Financial Officer
Justin Clary, P.E., Interim City Manager/Public Works Director
Steve Wall, P.E., City Engineer

City of Ridgefield Development Activity- June, 2006

Project	Project Address	Developer	Contact	# of Lots	Status
1	Taverner Ridge 1851 S. Hillhurst Rd.	Taverner Development LLC PO Box 279 Ridgefield, WA 98642	Will Mott 360-887-3560	259	Phase 1 & 2 final plat approval granted. Building permits being issued
2	Cassini View 1930 S. Hillhurst Rd.	Charter Development LLC 2127 East 9th Street Vancouver, WA 98661	Bob Borth 360-609-1403	51	Final plat approved. Building permits being issued
3	Hillhurst South Hillhurst Road, east of South 6th Way	NVR, LLC 1730 SW Skyline Blvd Suite 105 Portland, OR 97221	Rob Jurgenson 503-292-6733	82	Phase 1 plat approval granted. Phase 2 final plat issued
4	Heron Ridge Heron Drive	Cascade West Development Inc. 6107 NE 99th Street Vancouver, WA 98665	Lloyd Stenerson 360-256-1338	145	Phases 1,2, and 3 final plat approved. Building permits being issued.
5	Bellwood Heron Rive & Reiman Rd	Sun Country Homes, Inc. 2401 West Main Street, Suite 108, Battle Ground, WA 98604 and Holt Homes, Inc. PO Box 87980 Vancouver, WA 98687	John Mattila 360-887-8815 or Pete DeWitz 360-887-8815	279	Phases 1-3 built out; Phase 4 final plat approval granted. Building permits being issued
6	Cedar Ridge South of Pioneer Street and west of 35th Avenue	Sun Country Homes, Inc. 2401 West Main Street, Suite 108, Battle Ground, WA 98604	John Mattila 360-904-4973	183	Phase 1 and 2 final plat approval granted. Building permits being issued.
7	Osprey Pointe (formerly Kirschenbaum PUD) Garrison Ridge	Pacific Lifestyle Homes, Inc. 11815 NE 99th Street Suite 1200 Vancouver, WA 98682	Kevin Wann 360-573-8081	58	Final Plat approval granted. Building permits being issued.
8	Pioneer Canyon Eastside of South Hillhurst Road	Ott Gailther 8913 NE 151st Circle Battle Ground, WA 98604	Ott Gailther 360-798-2282	18	Preliminary plat approval granted on May 25, 2005; Phase 1 engineering approval granted
9	Canyon's Ridge PUD NW Corner of Pioneer & 45th Ave)	Mark Jeffries & Mark Voegelé 504 NE Bassel Road Vancouver, WA 98685	Mark Jeffries 360-518-1747	279	Preliminary plat approval granted on June 29, 2005; In for engineering review. Early clearing and grading permit has been issued
10	Columbia Hills PUD 1735 S. Sevier Road	Preterra Development Ventures, LLC. 1701 Broadway Suite 184 Vancouver, WA 98663	Corey Harris 360-521-5888	55	Preliminary plat approval granted on October 18, 2005. Engineering under review.
11	Bella Noche PUD S. Hillhurst Road and S. Sevier Road west	Tim Aiding & Associates 6140 SW Macadam Ave. Portland, OR 97239	Tim Aiding 503-816-5152	86	Preliminary plat approval granted on October 18, 2005. Engineering under review.
12	Green Gables PUD 177 North 34th Place	Bruce Kirschenbaum 17520 NE 97th Avenue Battle Ground, WA 98604	Bruce Kirschenbaum 360-574-3197	59	Preliminary plat approval granted on December 14, 2005. Engineering under review.
13	Green Gables PUD Pioneer Street & N. Smythe Rd. (North of Cedar Ridge PUD)	Tim Aiding & Associates 6140 SW Macadam Ave. Portland, OR 97239	Tim Aiding 503-816-5152	253	Preliminary plat approval granted on December 14, 2005. Engineering under review.
TOTAL				1,807	

Non-Residential Projects in the City of Ridgefield

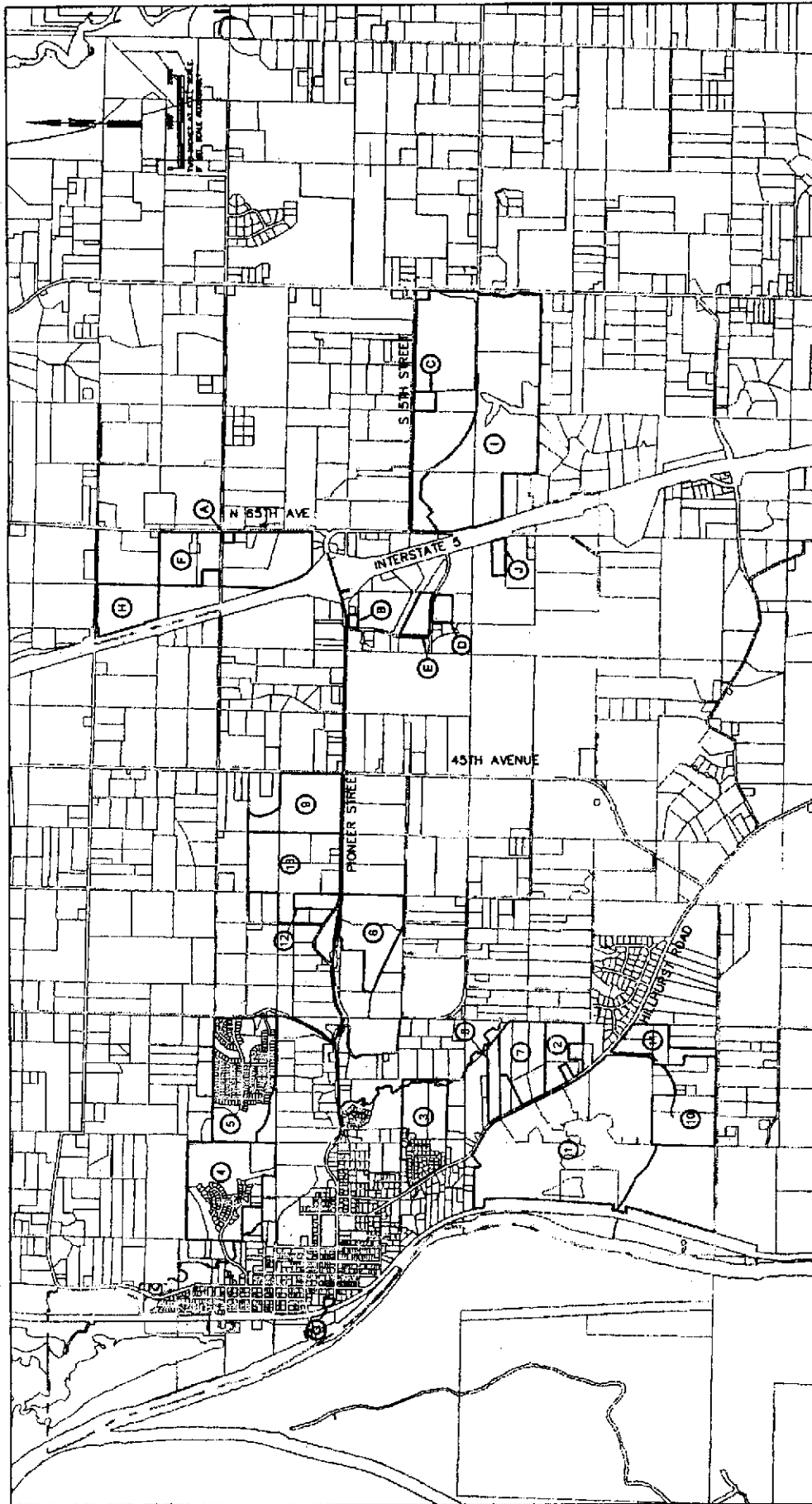
Project	Project Address	Developer	Contact	Square feet	Status
A	Clark County Fire District 12 Fire Station 10th Avenue	Clark County Fire District No. 12 260506 NE 10th Ave. Ridgefield, Wa 98642	Tim Dawdy 360-887-4609	17,500	Final land use approval granted June 1, 2005. Occupancy Permit issued
B	Heron Gate Office/Retail Building Southeast corner of South 56th Place and Pioneer Street	Filgipath, LLC PO Box 36, Ridgefield, WA 98642	Ned Walker 360-887-4849	19,000	Preliminary Land Use Review granted May 24, 2005. Building permits issued-under construction
C	Hinton Industrial at Union Ridge South 5th Street	SC Hinton, LLC 14010-A NE Court, Suite 106, Vancouver, WA 98685	Dan Glenz & Mike Bules 360-546-1220	150,000	Preliminary Land Use Review granted March 14, 2005. Second building "C" awaiting final site plan review
D	MTR Western Charter Coach South of 6th Way	MTR Western 605 5th Ave South, Suite 850, Seattle WA 98104	Mark Renner 800-975-0464	24,683	Developer has not proceeded with this proposal
E	Pacific Power Products North of South 6th Way next to the existing facility	Pacific Detroit Realty 600 S. 56th Place Ridgefield, WA 98642	Jack Kitz 360-816-1400	104,000	Land Use Approval granted November 9, 2005. Building & Engineering under review.
F	Port One Building Southwest corner of 56th Place and Pioneer Street	Cutting Reign LLC 109 SW 1st Street, Suite 259 Battleground, WA 98604	Dean Maldonado 360-666-5702	30,000	Developer has not proceeded with this proposal
G	Village View Mixed Use Development 104 Pioneer Street, west of North Main Ave.	Ridgefield Properties LLC 104 Pioneer Street, Ridgefield, WA 98642	Mary Bodine 360-281-7232	6,144	Resubmitted Sept. 2, 2005. Land Use Review approved
H	Seventh Day Adventist Educational Training Facility 1715 NW 289th	North Pacific Union Conference of Seventh Day Adventists 1498 SE Tech Center Places Suite 300 Vancouver, WA 98683	Norm Klam 360-816-1400	35,640	Engineering review being conducted. Foundation permit issued.
I	Union Ridge Master Plan/Commercial Industrial Subdivision East and West of Interstate 5	Pioneer Estates, LLC, Ridgefield Junction, LLC & SC Graf, LLC 730 17th Street, Suite 615 Denver, CO	John R. Crist 887-634-6630	352 gross acres 22 lots	Land Use approval granted by City Hearing Examiner Sept. 2, 2005
J	Parr Lumber Company Timim Road & South 6th Way (Specht Industrial Subdivision)	Parr Lumber 5630 NW Five Oaks Drive Hillsboro, OR 97124	Brad Farmer 503-614-2500	25,600	Land Use Approval granted November 9, 2005
K	Discovery Point (Commercial Subdivision) East of 1-5 and west of NW 65th Ave	Port of Ridgefield PO Box 55 Ridgefield, WA 98642	Brent Greening 360-887-3873	78 acres into 16 lots	Preliminary plat approval granted on October 18, 2005
L	Pacific Crest Custom Cabinetry S. 15th Street (Specht Industrial Subdivision)	Pacific Crest Custom Cabinetry 13825 SW Galbreath Dr., Suite A, Sherwood, OR 97140-9167	Kraig Tront 503-925-8966	705, 777 square feet	Application submitted April 17, 2006, currently under land use review
TOTAL				1,118,344	

Residential Projects Currently Under Review

Project	Project Address	Developer	Contact	# of Lots	Status
I Canterbury Trails Subdivision	abutting 45th Avenue to the west and N 10th Street to the north.	Kamil Lakhani, 8115 Broadway, Suite 204, Everett, WA 98203	Latif Lakhani 425-438-1811 ex. 111	64	Application submitted April 14, 2006
II Diamond Meadows Subdivision	3764 Pioneer Street, abutting Pioneer Canyon PUD to the east	George Diamond, 2539 SW 2nd Avenue, Portland, OR 97201	George Diamond 503-222-1655	48	Application submitted May 8, 2006
III Ridgefield Woods PUD	595 45th Avenue, north of Pioneer Canyon Subdivision	James Kessi, Moss & Associates 717 NE 61st Street, Suite 202 Vancouver, WA 98665	James Kessi 360-260-3509	39	Application submitted May 8, 2006
IV Stephenson Manor	S. Hillhurst Road approximately 1/2 mile south of Pioneer Street	Ott Gaither, 8913 NE 151st Circle Battle Ground, WA 98604	Ott Gaither 360-798-2282	30	Application submitted on May 12, 2006
V Kaufman Subdivision	902 N. Main Avenue	Ken & Laura Kaufman, 902 Main Avenue, Ridgefield, WA 98642	Ken Kaufmann 360-887-2990	5	Application submitted June 1, 2006
			TOTAL	186	

Pre-Application Meetings October 2005 to Present (June, 2006)

Project	Project Address	Developer	Contact	Square feet/Lots	Status
Quail Hill Subdivision	Proposed Lot 8 of the Union Ridge Master Plan Subdivision	Pioneer Estates, LLC, Ridgfield Junction, 2 N Cascade Avenue, Colorado Springs, CO 80903	Zack Goldfinch 360-695-1385	78 lots	Pre-app meeting was held on February 8, 2006
High Tech Manufacturing Services Inc.	Timon Road and South 11th Street (Ridgfield Commerce Center)	SKS Investments, LLC P.O. Box 820446 Vancouver, WA	Larry Wilson 360-696-4722	(2) 14,868 square foot buildings	Pre-App meeting was held October 12, 2005
Gretsch Property Subdivision PUD	Pioneer Street and 45th Avenue (southwest corner)	Holt Homes PO Box 87970 Vancouver WA 98661	Pete Dawitz 360-892-0514	260 units	Pre-App meeting was held November 9, 2005 for a Planned Unit Development that would include 89 single family detached and 171 attached units. Proposal for four (4) office/retail buildings totaling 25,000 square feet. Pre-App scheduled for December 14, 2005
Pioneer Crossing Commercial Development	Southwest corner of 56th Place and Pioneer Street (formerly the "Port One" building)	IRE, LLC, c/o: Rick Haddock & Keith Pfeifer 6100 NE Hwy 99, Vancouver, WA 98665	Rick Haddock or Keith Pfeifer 360-696-4571	25,000	
Ridgfield Self-Storage, LLC	On the north side of Pioneer Street approximately 1500 feet west of the I-5	Ed Kawasaki 2811 E. Evergreen Vancouver, WA 98661	Ed Kawasaki 360-936-1693	182,600	Proposal for and 182,600 square foot self-storage proposal scheduled for a pre-application meeting on December 21, 2005
Ridgfield Homesites Subdivision	South of Bellwood Heights, west of Reiman Road	Pacific Landmark Development 10135 SE Sunnyside Road, Suite 135 Clackamas, OR 97015	Rain Tuttle 503-780-9600	49 lots	Pre-application meeting held March 15, 2006
Cobb Property Subdivision	West of Reiman Road, and south of Bellwood Heights Subdivision.	Hinton Development Corporation Attn: Ryan Hurly 14010-A NE 3rd Court, Suite 106, Vancouver, WA 98685	Ryan Hurly 360-546-1220	10 lots	Pre-application meeting held April 5, 2006
Pioneer Place	844 N 35th Place (North of proposed Green Gables PUD & Pioneer Canyon	Mark Voegelé PO Box 130 La Center, WA 98629	Mark Voegelé 360-901-7232	47 lots	Pre-application meeting held April 12, 2006
Taverner Ridge Multifamily Tract	The site borders S. Hillhurst Road to the northeast and S. Sevier Road to east.	DR Horton, Mike Loomis, or J. Matt Brown P.E., 4386 SW Macadam Avenue, Suite 102, Portland, OR	Mike Loomis 503-222-4151	160	Pre-application meeting held May 3, 2006
Hendrickson Subdivision	Southwest of S. Hillhurst Road and approximately 500 feet west of Royal	Paul & Margie Hendrickson, 3618 NW 161st Way, Ridgefield, WA	Scott Brantley 360-695-1385	41	Pre-application meeting held May 17, 2006
				645 lots / 237,336 s.q.	



CITY OF RIDGEFIELD
DEVELOPMENT ACTIVITY MAP



- PACIFIC POWER PRODUCTS**
- 12 DISCOVERY POINT
 - 13 VILLAGE VIEW
 - 14 NORTH PACIFIC UNION CONFERENCE CENTER
 - 15 UNION RIDGE MASTER PLAN
 - 16 PARK LINDER

- CANYON'S RIDGE**
- 17 COLUMBIA HILLS
 - 18 BELLA RIDGE
 - 19 GREEN DALES
 - 20 CEDAR FIRE STATION
 - 21 HERON GATE
 - 22 HANTON INDUSTRIAL
 - 23 MIR WESTERN

- TANAGER RIDGE**
- 1 TANAGER RIDGE
 - 2 CASSIN VIEW
 - 3 HILLHURST
 - 4 HERON RIDGE
 - 5 BELLWOOD HEIGHTS
 - 6 CEDAR RIDGE
 - 7 COPLEY POINT
 - 8 GARRESON RIDGE
 - 9 PIONEER CANYON

- LEGEND**
- EXISTING URBAN GROWTH BOUNDARY
 - EXISTING RIDGEFIELD CITY LIMITS
 - 1-10 RESIDENTIAL DEVELOPMENT PROJECTS
 - AJ NON-RESIDENTIAL DEVELOPMENT PROJECTS

