



City of White Salmon
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October 14, 2008

Stanley Speaks, NW Director
Bureau of Indian Affairs
911 NE 11th Avenue
Portland, OR 97232

Dear Mr. Speaks:

RE: Comments on the Confederate Tribes of the Warm Springs Bridge of the Gods Resort and Casino Draft Environmental Impact Statement (DEIS)

Dear Sir:

The City of White Salmon submits these comments on the Draft Environmental Impact Statement for the Confederated Tribes of the Warm Springs Bridge of the Gods Resort and Casino. We appreciate the opportunity to address the Draft EIS.

General Concern

The City understands that the Confederated Tribes of the Warm Springs are interested in developing a casino and associated resort and recreational facilities in the City of Cascade Locks, Hood River County, State of Oregon. The Confederated Tribes' goals are to provide for the long term economic and social well being and self-sufficiency of both the tribal government and its members. Under Section 20 of the Indian Gaming Regulatory Act, 25 U.S.C. Sec 201-2721, it is the Secretary of the Interior's responsibility to determine if the establishment of an off-reservation gambling facility will be in the best interest of the tribe and its members and will not be detrimental to the surrounding communities. The City's comments on the DEIS are drafted to meet these standards.

The City further understands the Confederated Tribes, as a sovereign nation, and in connection with the fee-to-trust process, has signed a Compact with the State of Oregon to allay concerns about specific Casino impacts. The compact addressed 1) authorization of the kind, number and location of certain gaming activities, 2) addressed regulation of the issuance of gambling licenses and other gaming permits, 3) addressed criminal jurisdiction over activities that are committed on the off reservation casino properties, and 4) agreed to the development of health, safety and environmental standards for the Cascade Locks land and for the enforcement of same. These agreements included adopting special ordinances for the protection of future employees of the Resort and

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Casino, maintaining consistency with the Columbia River Gorge National Scenic Area Act and addressing "local public safety concerns" including transportation improvements.

A key component to the compact is the Confederated Tribes' promise to establish a Community Benefit Fund for the benefit of eleven identified counties within the State of Oregon. Those eleven counties include communities as distant as Washington County. Proposed uses include grants for education; health; public safety; gambling addiction prevention, education and treatment; the arts; the environment; cultural activities; historic preservation and other charitable purposes. Of concern to the City of White Salmon is the lack of provision in the compact for the neighboring Washington State communities. The Confederated Tribes have allowed a State boundary to obscure the tribe's ability to mitigate long term needs in neighboring communities on the north side of the Columbia River. This is counter to the long term cooperation between our two communities. In developing our gorge-wide tourism, the six Chambers representing the six counties have focused on promoting the gorge as an economic region straddling both sides of the river. We are concerned that the compact agreement and project fail to recognize this bi-state cooperation and socio economic interdependency.

Housing Impacts:

Needless to say, the issue of affordable housing must be addressed. The Columbia Gorge Region leadership has identified affordable housing as a critical need within the community. Most of the preparation of the socio-economic materials for the DEIS were completed nearly three years ago and do not reflect these current regional concerns.

The presenters preface Section 4.1.4 of the Socio-Economic Section by emphasizing the uncertainty of their predictions of socio-economic behaviors. They predicted the project would create initially 856 direct jobs and 220 indirect jobs, with final total of 1,700 jobs. Since the study's completion, residential lots in White Salmon are \$150,000 to \$400,000; new residences in these same neighborhoods have homes beginning at \$350,000 to \$750,000. This is not expected to meet the predicted workforce's needs.

The study predicted more than 426 employees would be commuting from out of the area. With the significant increases in gasoline/diesel costs, the attraction of commuting long distances may discourage commuting creating more pressure on the local housing market. Affordable housing will need to be addressed and the surrounding communities will not be able to address the workforce housing with assistance.

Thank you for your consideration of these comments. We look forward to working with you.

Respectfully,



David R. Poucher, Mayor
City of White Salmon