



# CITY OF STEVENSON

7121 E Loop Road, PO Box 371, Stevenson, WA 98648

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

May 15, 2008

Stanley Speaks, NW Director  
Bureau of Indian Affairs  
911 NE 11 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 Stevenson 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 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) the 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 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 Stevenson – the nearest neighboring City to Cascade Locks - 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. The City has served as a mutual aid partner to the Cascade Locks Fire Department for over twenty-two years; and for a period of time actually functioned as the only fully manned response to fires in Cascade Locks. 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.

Eleven counties are eligible for money to mitigate for the Casino's impact to education, public health and safety, and for the treatment and prevention of gambling addiction. Under the terms of the March 25, 2005 Memorandum of Understanding among the Tribe, the City of Cascade Cocks, and the County of Hood River, the Tribe has obligated itself to pledge funds from the Community Benefit Fund for law enforcement, fire and emergency services, and traffic mitigation, among other benefits. The City of Stevenson, 5 miles away, is not eligible; but if you lived in Washington County you could apply for relief. We would respectfully request consideration for inclusion in receiving expenditures from the Community Benefit Fund.

### Transportation Impacts

The Draft EIS predicts 3,000,000 annual visitors and expected employment beginning at 1200 and growing to 1700 employees. This does generate some transportation related concerns.

While supporting the proposal for a new interchange (Exit 46) that will provide rail grade separated direct access between the proposed Casino site and Interstate 84 the City of Stevenson **opposes the closure of the 'East Cascade Locks Interchange (Exit 45)**. The City understands that to maintain exits at both MP 45 and MP46 would require a design exception by ODOT and that ODOT can make such a design exception if local conditions warrant.

The City requests that the BIA request a variance from the design standards and submits the following arguments:

- The American Association of State Highway and Transportation Officials (AASHTO), A Policy on Geometric Design of Highways and Streets, 2004, page 743 defines a “highways interchange” as ... *a system of interconnecting roadways in conjunction with one or more grade separations that provides for the movement of traffic between two or more on different levels*”. Further, the ‘Policy’ provides an illustration of a split interchange in Exhibit 10-54. Among the interchanges illustrated in the exhibit is a “split” interchange where two pairs of ramps are provided at two separate crossroads in order to provide full access to a highway in all travel directions. The current east and west Cascade Locks Interchanges function as a split interchange and I-84 signage assign the two ramps with the same exit number, Exit 44. US 30 currently serves as the connecting road between the two halves of the interchange. Exit 44 is a critical regional link connecting I-84 with US 30 and Washington State Route 14 via the Bridge of the Gods. The interchange is a visible and historical route familiar to travelers. This regional connection serves as a key freight route between Oregon and Washington. Closing the existing east leg of Exit 44 will force freight, commuter and local traffic to detour onto local collector roadways in order to access eastbound I-84 and exit westbound I-84. Forcing regional traffic on to a local collector will reduce the efficiency and safety of the current regional traffic pattern. The two existing halves of Exit 44 should remain to provide full and acceptable regional connections between I-84, US30, Bridge of the Gods, and SR 14. The City supports the 1 mile interchange spacing particularly when the issue of regional connectivity is considered. The new interchange would not require a variance from the FHWA policy.
- The AASHTO (FHWA) Policy states “Minimum spacing of arterial interchanges (distance between intersecting streets with ramps) is determined by weaving volumes, ability to sign, signal progression, and lengths of speed-change lanes. A general rule of thumb for minimum interchange spacing is 1.5 KM (1 mile) in urban areas and 3.0 KM (2 miles) in rural areas. Washington State has adopted this FHWA policy. Oregon has chosen to require a standard spacing of 3 miles in urban areas. If the east interchange (Exit 45) is closed and westbound traffic is routed on to Forest Lane and I-84 Frontage Road safety hazards will increase. ODOT records indicate that collector roadways are typically more prone to crashes than interstate freeways (0.52 average 5-year (2002-2006) statewide crash rate for interstate freeways compared to 2.2 average 5-year statewide crash rate for urban collector roadways). Improvements to I-84 Frontage Road will be constrained by the adjacent wetlands. And during inclement weather routing traffic on to a minor collector will increase safety hazards for interstate trucking.
- Maintaining adequate truck/freight mobility is a top priority for the Washington State Department of Transportation. Adequate truck/freight mobility is essential for the economic vitality of both local and regional businesses. If the East Cascade Locks portion of the split interchange were to be closed all of the interstate truck traffic would be diverted to off of the high speed interstate system

on to a slower local road system, increasing shipping time of freight and increasing safety hazards. Studies conducted by the City of Cascade Locks indicates that travel time for trucks entering and exiting the State of Washington via the Bridge of the Gods would increase by up to ~ three minutes per travel direction resulting in approximately 6,000 hours of delay based on 2006 average daily traffic volumes and truck percentage data provided in the Draft Environmental Impact Statement.

**The City does not agree with the Draft EIS' recommendation to not consider improvements to the intersection of SR14 with the Bridge of the Gods.**

Based on analysis of existing traffic patterns and regional destinations/market analysis conducted by ECONorthwest (2003) the DEIS assigned only a 5% traffic increase at the Bridge of the Gods intersection generated by the new Casino and associated hotel and retail facilities in the first year of operation. This increase includes visitors, delivery trucks and employees. The City questions whether ECONorthwest adequately assessed the rapidly growing communities in east Clark County, Camas and Washougal and growing congestion on the Samuel Jackson Bridge (205 Bridge) that may deflect more traffic on to SR14.

In the Traffic Study, based on the 30<sup>th</sup> highest hour using the baseline trip generation assumption of 0.5 trips per gaming position, the consultant predicted a total increase of 65 trips across the Bridge of the Gods (Fig. 30) attributable to the casino and associated resort facilities. Predicted peak hour increases were at 120 trips assigned to the casino and associated facilities.

The DEIS recognized that the SR 14 intersection with the Bridge of the Gods is currently operating at an LOS of C to D depending on the time of day. The report noted that opening of the Casino would lower the general operational rating to LOS of D. The DEIS further predicted that the by 2028 the LOS will be at F. The DEIS recognized that the SR14 intersection with the Bridge of the Gods had the highest number of accidents of any intersection studied (crash data 2000-2004); and shared the lowest level of service with the bridge intersection on the south side of the river.

The City does agree that average daily traffic counts across the Bridge of the Gods will increase due to increased traffic generated by the casino. With an increase in commuter work force traffic to and from the casino added to the increase in visitors traveling to Cascade Locks on SR14 the City is concerned about the flow of traffic at this intersection and general safety. The west bound stacking lane may not have sufficient capacity for south bound traffic. This would create a traffic hazard at the intersection. Currently, traffic turning to access the 'informal park and ride' east of the bridge contributes to safety issues. During the summer months recreational fishing use at Ice House Lake create additional hazards.

Given the conservative estimates for increased traffic attributable to the Casino and Resort operations across the Bridge the City is urging the applicants to reconsider their

recommendation regarding improvements at the intersection of SR14 with the Bridge of the Gods.

Housing Impacts

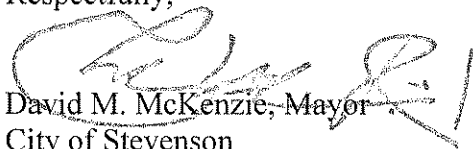
Needless to say the issue of affordable housing must be addressed. The Columbia Gorge Region leadership has identified affordable housing as a critical need within the community. Most of the preparation of the socio-economic materials for the DEIS were completed nearly three years ago and do not reflect 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 1700 jobs (includes corrections for net gain with the closure of the casino at Kahneetah and longer term). The Study estimated regional housing demands due to the Casino/Resort project (direct, indirect and induced) would create a need for 70 additional dwelling units in Stevenson representing 17.6 residential acres. Since the study's completion the new subdivisions completed in Stevenson are listing residential lots at \$100,000 to \$150,000; new residences in these same neighborhoods have homes beginning at \$350,000 to \$400,000. This is not expected to meet the predicted workforce's needs.

The study predicted more than 426 employees would be commuting from out of 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 without assistance.

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

Respectfully,



David M. McKenzie, Mayor  
City of Stevenson

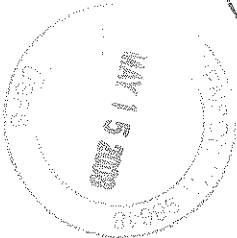
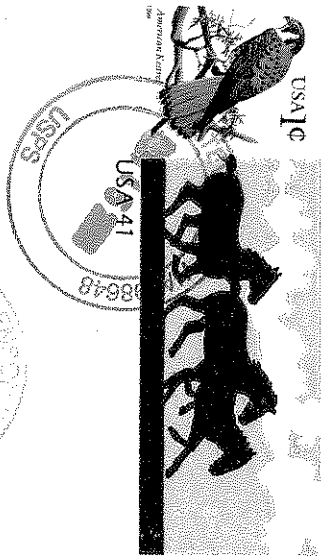
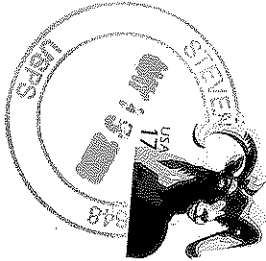
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