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May 12, 2008

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

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

Re: Cascade Locks Casino Draft Environmental Impact Statement

Dear Mr. Speaks:

I have reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Cascade Locks Casino for impacts to the National Scenic Area and consistency with Scenic Area rules. I would like to provide the following comments on the two alternatives that include lands currently within the General Management Area of the National Scenic Area.

Hood River Option A would place a casino and all support structures, except for an access road, on land currently held in trust for the Warm Springs tribe. Tribal trust lands are exempt from Scenic Area rules; thus I have no comment on Hood River Option A except pertaining to the access road. Portions of this road would occur within the General Management Area of the National Scenic Area. I concur with the conclusion of the Forest Service 2001 letter cited in the DEIS that the access road would require consistency review with *The Management Plan for the Columbia River Gorge National Scenic Area* (Management Plan). While a new road is an allowed review use within the land use designations through which it would pass, I concur with the DEIS that the potential impacts to scenic, natural and recreational resources could require mitigation. It also appears that both Hood River alternatives would likely adversely affect the Historic Columbia River Highway unless mitigation reduced the effect on cultural resources to no adverse effect.

Hood River Option B includes a fee-to-trust transfer of approximately 175 acres of land currently owned by the Warm Springs tribe but not held in trust. Because tribal trust lands are exempt from Scenic Area rules, this would in effect remove 175 acres from the National Scenic Area. The placement of land into trust would require consistency review with the Management Plan. My views are consistent with my predecessor, Martha Bennett, regarding concern about the precedent a fee-to-trust transfer would set for other National Scenic Area lands. If the 175 acres were not transferred to trust, the uses proposed on those lands would require consistency review with the Management Plan. It is not clear that all of the development proposed for those 175 acres (parking lots, water reservoir, wastewater and stormwater reclamation facilities, potentially some of the casino building) are allowed review uses in the land use designations within which they fall. If they are allowed review uses, potential impacts to scenic, cultural, natural and recreational resources would require mitigation.

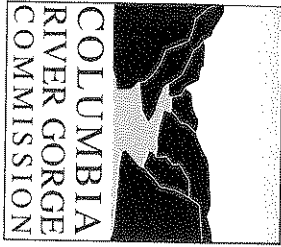
Stanley Speaks
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Thank you for the opportunity to submit comments on the Draft Environmental Impact Statement.
Please contact me if you have any questions regarding my comments.

Sincerely,

A handwritten signature in cursive script that reads "Jill Arens".

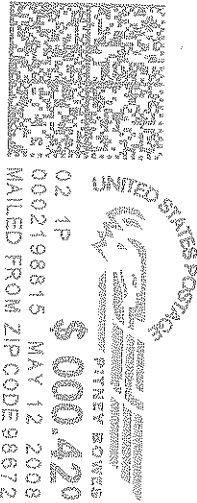
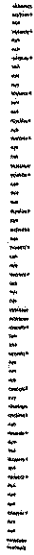
Jill Arens
Executive Director



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