



JACKSON COUNTY

Oregon

Board of Commissioners

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10 South Oakdale, Room 214
Medford, Oregon 97501

April 30, 2013

Mr. Stan Speaks
Northwest Regional Director
Bureau of Indian Affairs
911 Northeast 11th Avenue
Portland, Oregon 97232-4169

RE: Coquille Indian Tribe Application for Acquisition of Trust Property
Jackson County Comments

Dear Director Speaks:

Thank you for granting a 60-day extension for the Jackson County Board of Commissioners ("Board") to submit comments on the application of the Coquille Indian Tribe for acquisition of property to be held in trust by the Bureau of Indian Affairs for Class II gaming. The extension allowed the Board to meet with representatives from the Coquille Tribe and the Cow Creek Band of the Umpqua Tribe in an effort to better understand the issues related to this application.

Although these meetings were helpful in providing the Board some limited, additional insight into the proposal, the Coquille Tribe has not, from the Board's perspective, meaningfully or satisfactorily responded to the many concerns Jackson County raised in its letter requesting an extension or to the questions raised during the meeting. The Coquille Tribe has not adequately identified or quantified the scope of potential adverse effects this proposal may have on law enforcement services, regional infrastructure, and various community social and mental health services. The Coquille Tribe has also not directly addressed the financial and administrative concerns raised by the Board, and has not proposed any specific measures to mitigate the adverse community impacts which are certain to accompany the casino operations.

The Board also has concerns about the legal issues related to this application. The Coquille Tribe claims it is entitled to approval of this application under §2719(b)(1)(B)(iii) of the Indian Gaming Regulatory Act ("IGRA") relating to "restored lands." However, Jackson County's legal advisors have concluded that this application should be processed as an off-reservation request under §2719(b)(1)(A), which requires the Governor of this State to concur with the Secretary's determination that this proposed gaming activity "would not be detrimental to the surrounding community . . ." and provides for the opportunity to mitigate those potential detriments through fee for service agreements. The application is not being processed in accordance with these provisions and clearly should be.

In addition to the foregoing concerns, a majority of the Board is philosophically opposed to any expansion of casino gaming in this community. Further, the Board believes it is inappropriate for casino gaming to be perpetuated throughout the State by individual tribes expanding into communities that were not part of the tribe's ancestral territory.

For a number of reasons, including, but not limited to the concerns noted in this letter, Jackson County is opposed to the application of the Coquille Indian Tribe for acquisition of a 2.42 acre parcel to be held in trust by the Bureau of Indian Affairs for Class II gaming. The Jackson County Board of Commissioners is further requesting that this application be processed under §2719(b)(1)(A) of the IGRA and, should the application not be immediately denied, that the Secretary postpone making a decision until the Environmental Impact Statement (EIS) is completed and all of the stakeholders, including Jackson County, are given an additional opportunity to provide comments in light of the EIS findings.

If you have any questions regarding this matter, please contact County Administrator Danny Jordan at (541)774-6035, or County Counsel Rick Whitlock at (541)774-6160.

Respectfully,

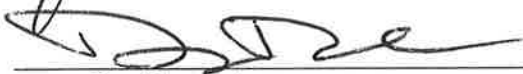
JACKSON COUNTY BOARD OF COMMISSIONERS



Don Skundrick, Chair



John Rachor, Commissioner



Doug Breidenthal, Commissioner

cc: Office of Indian Gaming, U.S. Department of the Interior
Coquille Indian Tribe
Cow Creek Band of Umpqua Tribe
Liani J. Reeves, Governor's General Counsel
Eric Swanson, Medford City Manager
Danny Jordan, County Administrator
Rick Whitlock, County Counsel