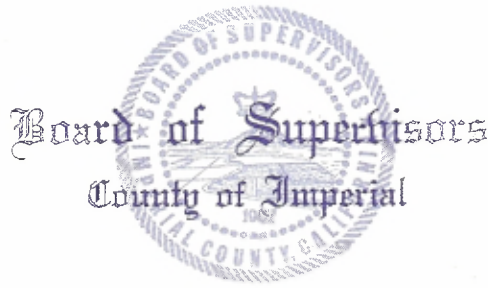


WALLY LEIMGRUBER  
SUPERVISOR - DISTRICT 5  
940 MAIN STREET, SUITE 209  
El Centro, CA 92243



BUS: (760) 482-4305  
RES: (760) 356-2639  
FAX: (760) 352-7876  
PAGER: (760) 370-7740

March 27, 2008

Amy Dutschke  
Acting Regional Director  
Pacific Regional Office  
Bureau of Indian Affairs  
2800 Cottage Way  
Sacramento, California 95825

Re: DEIS Scoping Comments, Manzanita Band of Kumeyaay Indians 60.8 acres fee-to-trust  
Casino Project, Calexico, California

Dear Ms. Dutschke:

I appreciate this opportunity to comment on the DEIS regarding the Manzanita Band of Kumeyaay Indians proposed off-reservation casino project in Imperial County. The "Tribe" application to BIA dated April 14, 2006 seeks to obtain approval for their project under an exception referred to in Section 20 of IGRA. If approved, the ownership status of the property would be converted from taxable status to nontaxable Indian trust status. This acquisition would impact state and local government as the property is removed from the tax roll.

Every Californian, including every tribal member, depends upon county government for a broad range of services, from public safety and transportation to waste management and disaster relief. Counties are the largest political subdivision of the state having corporate authority and are vested by the legislature with the powers necessary to provide for the health and welfare of all people within their borders. Counties are responsible for a countywide justice system, and social welfare, health, and other services including the following:

Sheriff:

-Coroner  
-County Jail  
-Search & Rescue Services

District Attorney:

-Attorney & Prosecutors  
-Criminal Child Support Investigations  
-Child Abduction  
-Welfare Fraud

Welfare:

- Employment & financial Services
- Child Protective Services
- Adult Protective Services
- Food Stamps
- Medi-Cal
- In-Home Supportive Services
- Adoption Assistant

Behavioral Health:

- Alcohol & Drug Abuse Program
- Mental Health Services for Medi-Cal Recipients
- School Based Services
- Recycling Information
- Household Hazardous Waste Facility

Planning & Development:

- Land use information
- Protection of property rights
- Code compliance and zoning enforcement

Public Health:

- WIC Food Voucher & Nutrition Education
- Environmental Health & Management
- Hazardous Materials Monitoring
- Clinics (i.e. well baby, pregnancy)
- Health Education Programs
- Birth records

County Administrative Office:

- Emergency & Disaster Management
- Economic Development

Farm, Home & 4H Advisor:

- Coordinate 4H program
- Provide Advice to Farmers & Gardeners

County Clerk/Recorder:

- General & Special Elections
- Marriage Licenses
- Death Records
- Passport Applications
- Voter Registration
- Recording of Official Records (deeds, liens, etc.)

Agriculture Department:

- Agriculture Law & Regulatory Enforcement
- Weights & Measures Enforcement
- Predatory Animal Control
- Pesticide Use Regulation

Public Works Department

- County Transit
- County Landfill

Assessor/Auditor/Treasurer

- Property Tax/Calculation/  
Collection/Distribution

Veterans Services:

- Benefit Assistance
- Veteran Memorial Halls

Public Defender:

- Legal Assistance to Indigent Citizens

Water & Resource conservation:

- Manage and Conserve Water  
for all County Residents

Treasurer – Tax Collector:

- Safekeeping & Investment of Public  
Funds

Probation:

- Probation-Parole
- Juvenile Hall
- Victim Witness Assistance
- Youth Authority Placement payment

Fire:

- Fire Suppression & Control
- First Response to Medical Emergencies

Child Supportive Services:

- Enforcement/Collection of  
Child Support Payments

Most of these services are provided to residents both outside and inside city limits. Unlike the exercise of land use control, such programs as public health, welfare, and jail services, are provided (and often mandated) regardless of whether a recipient resides within a city or in the unincorporated area of the county. These vital public services are delivered to California residents through its 58 counties. It is no exaggeration to say that county government is essential to the quality of life for more than 36 million residents in the state today. No other form of local government so directly impacts the daily lives of all citizens.

In addition, because county government has very little authority to independently raise taxes and increase revenues, the ability to adequately mitigate all off-reservation commercial endeavors is critical, or county services can be put at risk. California counties' ability to provide these mandated services has been significantly impacted by the expansion of Indian gaming.

Even when a gaming facility is within a city's jurisdictional limits, the impacts on county government and services may be profound. The California experience particularly has made clear that large casino facilities have impacts beyond the immediate jurisdiction in which they operate. Attracting many thousands of car trips per day, larger facilities cause traffic impacts throughout a local or even regional transportation system.

California currently leads the nation for off-reservation tribal gaming acquisition. The Bureau of Indian Affairs must concern themselves with establishing a coherent and consistent policy for acquired lands consistent with Section 20 of the Indian Gaming Regulatory Act.

Sincerely,



Wally J. Leimgruber  
Imperial County Supervisor

cc: Honorable Dirk Kempthorne-Secretary of the Interior  
Fax: 202-208-6956

Carl J. Artman-Assistant Secretary of Indian Affairs  
Fax: 202-208-5320

March 27, 2008

Property Owners:  
Hallwood Calexico Investments LLC  
3710 Rawlins St. Suite, 1500  
Dallas TX 75219

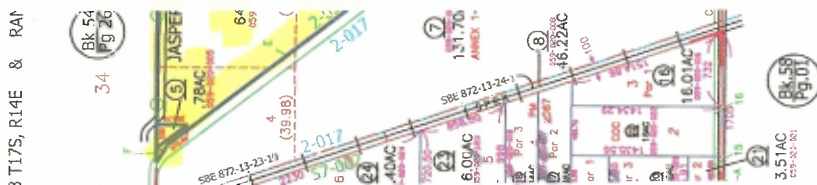
Re: 111 Calexico Place Project CA  
off- reservation casino  
Manzanita Band of Mission Indians

Acres:	Current Assessment	Property Taxes 2007
64.72	\$ 7,585,964.00	\$ 80,632.00
151.05	\$ 17,898,123.00	\$ 190,230.00
.78	\$ 15,912.00	\$ 176.80
<b>Total</b>		
216.55	\$ 25,500,000.00	\$271,038.80
<b>av. cost per acre</b>		<b>av. property taxes per year</b>
\$117,755.00		\$ 1,252.00
<b>Fee land-to-trust land:</b>		<b>Improvements:</b>
60.8 ac.		220,000-sq.ft. casino facility
aprox. value land		aprox. cost @ \$100.00/sq.ft
\$7,160,000.00		\$220,000,000.00
<b>Land &amp; Improvements</b>		<b>Property tax rate 1.0628%</b>
\$ 227,160,000.00		for this area in Calexico CA

Note: If the property remained on the tax roll and was built out with the improvements and assessed at \$ 227,160,000.00 at the current tax rate of 1.0628% the property tax amount would be \$ 2,414,256.00.  
Tribal Nations do not pay property tax as this property would transfer from fee-to trust lands.



Wally Leimgruber  
Imperial County Supervisor

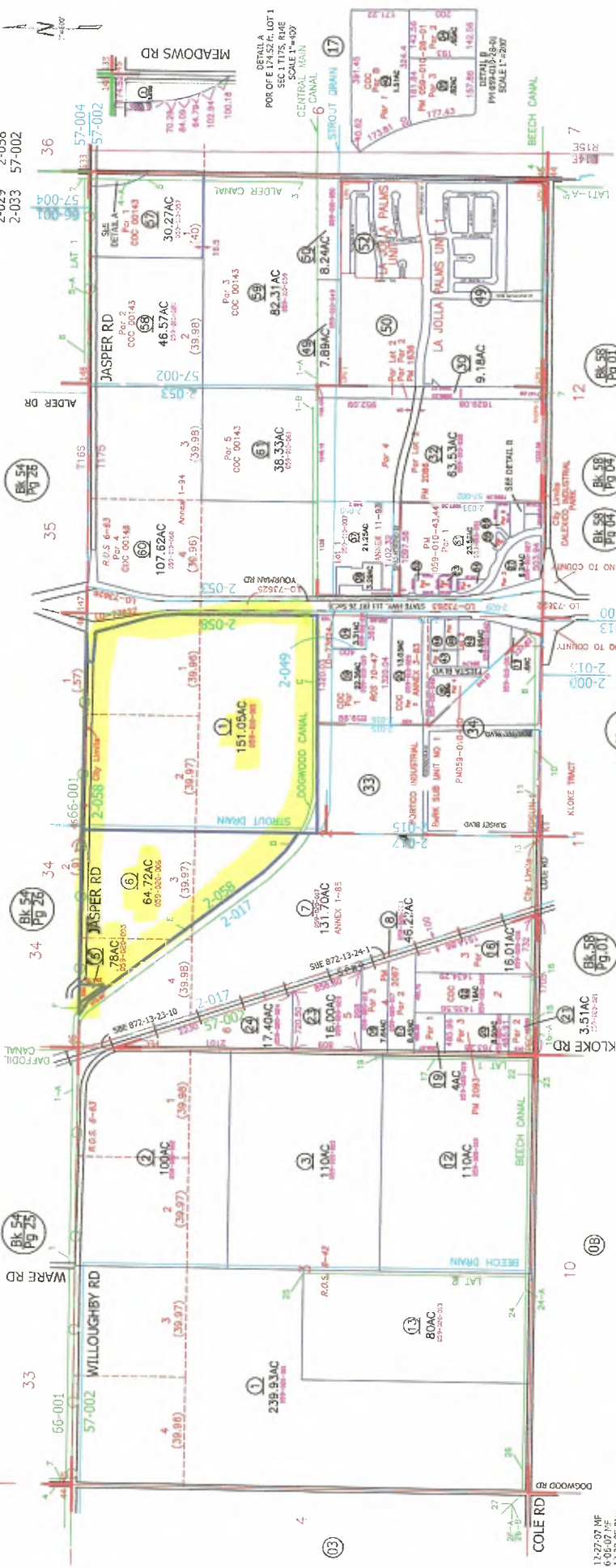


59-02

Tax Area Code  
2-017 POR SEC 34 T16S, R14E & P.E.CARR SUB & POR SEC 2 & SEC 3 T17S, R14E & RANCHO NORTE SUB, PHASE NO.1 & POR SEC 34 & 35 T16S, R14E & POR SEC 1 & 2 T17S, R14E  
2-058  
57-002

59-01  
Tax Area Code  
2-015 2-049  
2-016 2-050  
2-029 2-058  
2-033 57-002

PH17-29



13-27-07 MF  
6-05-07 MF  
12-28-06 R/L  
5-16-05 R/L  
7-25-04 R/L  
5-17-95 R/L  
8-1-94 R/L  
7-28-94 R/L  
FROM SF 84  
BLOW-UP FROM 57-02  
E: TRACE  
EP-7-90 LS

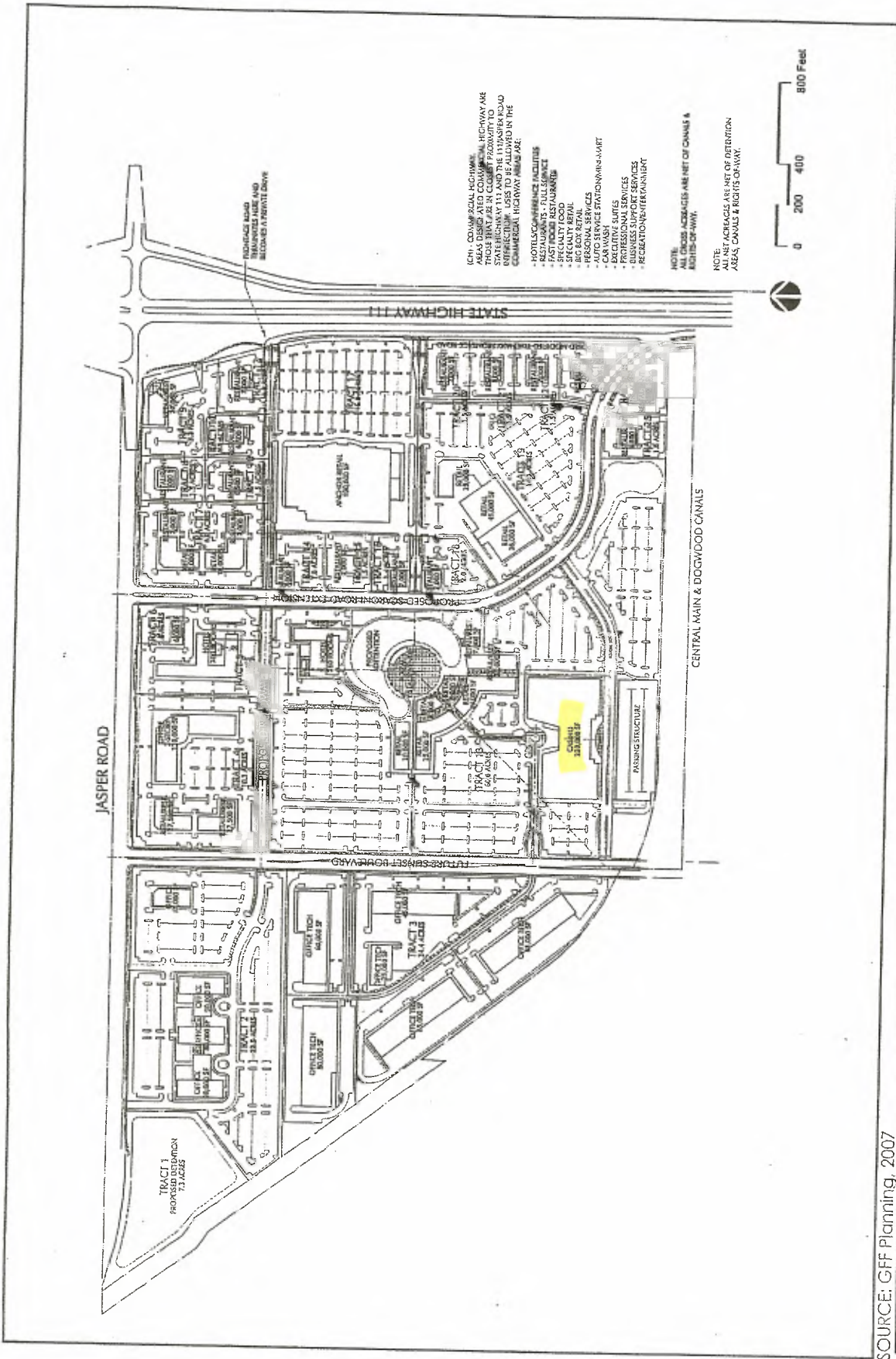
05-24-05 R/L  
05-24-05 R/L  
5-24-05 R/L  
5-25-04 R/L  
12-3-97 R/L  
12-3-97 R/L  
BLOW-UP FROM 57-02  
FROM 57-03  
1-15-58 LS

Assessor's Map Bk.59-Pg.02  
County of Imperial, Calif.

Assessor's Map Bk.59-Pg.01  
County of Imperial, Calif.



BEWARE!  
THIS IS NOT AN OFFICIAL MAP.  
THIS MAP WAS PREPARED FOR THE IMPERIAL COUNTY  
ASSASSOR'S OFFICE BY THE IMPERIAL COUNTY  
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SOURCE: GFF Planning, 2007



Ill. Callexico Place

### Conceptual Site Plan

03/13/07

FIGURE

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