

Mr. Dale Morris, Regional Director c/o
Mr. Dale Riesling, Acting Regional Director
United States Department of the Interior
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Re: Draft Environmental Assessment for the Proposed 40 Acre Fee- to-Trust Transfer for the
Tule River Indian Tribe

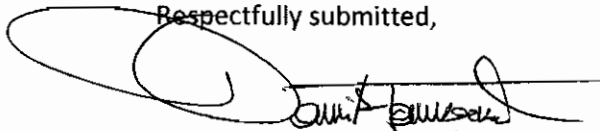
Dear Mr. Riesling,

I wish to offer the following comments and concerns regarding the potential economic impact of the Tule River Tribe's proposed fee-to-trust acquisition of 40 acres adjoining the Porterville Airpark. The Tribe has been a good neighbor to the City of Porterville and has established a record of cooperation with and generosity to various organizations. The concern I have is not the potential competition from retail facilities which may be established on the site. Competition is healthy and, ultimately, a benefit to all businesses and the community in general. The concern is for the potential of tribal tax advantages establishing an uneven playing field which may result in heavy economic losses to local businesses. With low profit margins, established businesses will likely not be able to reduce sales prices to compete with prices offered on tribal lands. Local businesses selling gasoline are currently experiencing this issue and some have reported large fuel sale reductions since the opening of the Eagle Feather Trading Post on tribal trust property near Success Lake. This facility is about 10 miles from Porterville yet draws residents to make the drive to take advantage of the discounted fuel. The prices are possible due to the tax exemptions enjoyed on trust land under current law. The economic impact of this single station on Porterville fuel retailers has been negative. I am concerned that a similar impact could be experienced by Porterville retail businesses.

It is my understanding that 25 CFR 151.11 (c) requires the Tribe to publish a business plan indicating the proposed use of the land. The application includes no such plan and it is also not addressed in the agreement forged with the City of Porterville. With no indication of the specific type of businesses included in the DEA, we may only speculate which businesses are the most likely to be impacted. If an auto mall were to go in, it would likely cripple auto dealerships in the City. If an outlet mall were developed, small clothing and accessories stores would feel the greatest reductions. The uncertainty of the proposed development requires us to consider many possibilities. It is my request that the fee-to-trust proposal be accompanied by the required business plan or a development plan which may be studied in greater detail so that the potential economic and environmental impacts may be considered before long-term decisions are made. I again wish to acknowledge the positive relationship the Tribe enjoys with local organizations and agencies. I would hope those established relationships would continue while developing a plan which will be beneficial to all sectors of the community.

Thank you for your consideration of these comments.

Respectfully submitted,



Dennis A. Townsend
633 North Westwood Street
Porterville, CA 93257