

LETTER 2 (LOG # A002)

Clark County Sheriff



Garry E. Lucas
Sheriff

July 10, 2006

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

Re: Cowlitz Tribal Development

Distinguished Representatives,

Thank you for the opportunity to review and submit comments on the Draft EIS dated April 2006. As a partner agency in the Cowlitz Tribal Development, the Clark County Sheriff's Office agreed to submit information and provide assistance to those preparing the EIS before final publication. We appreciate that some of the information provided was incorporated into the April 2006 Draft EIS.

A002-1

Having reviewed the Draft EIS, I am concerned that potential environmental consequences affecting public health and safety (section 4.0) from a development of this size and scope have not been fully incorporated into the draft document.

Law enforcement activity is routinely tracked, quantified and reported to various public and private authorities on an annual basis. The crime stats provided in section 3.10-1 were dated 2003; updated information is readily available and should logically be incorporated into the document.

A002-2

The report indicates that "local law enforcement officials were contacted to inquire about the impacts of casinos and whether the facilities induced a higher incidence of crime. Each local law enforcement agency contacted reported an increase in law enforcement service demand as a result of the opening of a casino within its jurisdiction. All report categories of crime and/or calls for service have increased". (4.10-6) As a law enforcement official responsible for crime

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reporting, I will assume that the information provided to the authors included data to support the hypothesis, yet no data is provided in the EIS for review or secondary interpretation. Without data, it is impossible to gauge the scope of a potential impact.

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Cont.

The report indicates that "although instances of these crimes have increased in all of the casino communities, no department could implicate the casino as the direct cause of the increase in crime. Rather, each department expressed that the increased concentration of people within the local area led to the increase in crime". (4.10-6) A very large scale development placed in an area that is currently farm land certainly would bring an increase in crime; if only because people will be frequenting the development. The authors should specifically acknowledge the anticipated increases in calls for service and crime, so that potential impacts can be realistically considered.

A002-4

Uniform Crime Reporting (UCR) statistics are referenced on page 4.10-7, however none of the data is provided for review. Crime rates are compared using non-specific terminology and a significant lack of information.

A002-5

The authors of the Draft EIS attempted to make some comparisons using law enforcement calls for service as a measure of police activity. It is important to know and understand what law enforcement agencies police casino developments. In some cases developments are served by both tribal and city or county police agencies. In some cases, multiple agencies serve tribal developments under cooperative agreements. Without knowing the specifics of each development, it is difficult to determine the true number of law enforcement calls for service in any given year.

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Crime Analyst Brian Salsig provided stats from 2005 for use in the Draft EIS, indicating that the Clark County Sheriff's Office responded to 500 calls for service in the area surrounding this development. The Draft EIS estimates that "Alternative A would result in between 200 and 1000 calls for service per year". Knowing that we presently respond to 500 calls per year in the affected area, the numbers provided seem very low.

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Fortunately, the Cowlitz Tribe has agreed to mitigate many of the quantifiable impacts through the Memorandum of Understanding with Clark County for law enforcement service. Clark County law enforcement service is greater than the scope of the development. Unfortunately, the Draft EIS does not specifically address many of the secondary impacts that may be felt by small and large cities near to the development that

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are not party to the MOU. Officials around the country have been candid when speaking about the phenomenon of "hot bunking", domestic violence, robbery, theft, and fraud crimes related to gambling establishments in their venues. While the development will not fall within the boundaries of the City of Ridgefield, the City of La Center, the City of Woodland, or the City of Vancouver, each could anticipate increased calls for service due to the quantity of people moving to and from the development. Increased law enforcement calls for service outside the development area are not sufficiently estimated or addressed.

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Cont.

In summary, the impacts of this large scale development will present challenges for law enforcement and the community. The MOU is just one part of the mitigation necessary to address this issue. Mitigation however requires a full airing of the potential impacts so that remedies can be collaborative and responsive.

I am not a traffic planner, but I have great concern that the conclusions drawn in the EIS regarding traffic impacts have been grossly understated. Consequently, the law enforcement implications of the traffic impacts have been understated. I have greater concern that the conclusions drawn in the EIS regarding impacts on calls for service and reported crime (two very different things) are not supported in the EIS with relevant data from similar developments. Both calls for service and reported crime have cross jurisdictional impacts, and that facet of the impacts of this development seems to have been missed.

A002-9

I hope this information is helpful to you as you review the Draft EIS. Please feel free to call on me or my staff should you need additional information.

Sincerely,



Garry E. Lucas
Sheriff