

*LETTER 24 (LOG # 231)*

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Terry Cornelius

**Kelly Heidecker**

**From:** Terry Cornelius [tlcornelius@earthlink.net]  
**Sent:** Thursday, July 13, 2006 8:45 AM  
**To:** kheidecker@analyticalcorp.com  
**Cc:** James\_Cason@ios.doi.gov  
**Subject:** re: Cowlitz/Mohegan casino Draft EIS comments

**From:**

**Terry Cornelius**  
31320 NW 41st Ave.  
Ridgefield, WA 98642

**RE: DEIS Comments, Cowlitz Casino-Resort Project.**

**I am against any mega casino in Clark County by the Cowlitz/Mohegan partnership. This location will have a net negative impact on our county and its residents in both socio-economic and mental health arenas. I have several specific comments in re: to the Draft EIS.**

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**MOST IMPORTANTLY IS THERE WAS NO ALTERNATIVE DISCUSSED THAT CONSIDERED A CASINO/RESERVATION IN THE HOME TERRITORY OF THE COWLITZ TRIBE. THIS IS AN INSULT TO THE MANY FOLKS WHO RAISED THIS QUESTION AT EVERY MEETING THE BIA AND DOI HELD AND SPECIFICALLY AT THE THE SCOPING MEETINGS. Your must correct this in any further studies.**

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**The Draft Environmental Impact Statement (DEIS) was tilted from the beginning to favor the site at the La Center interchange by providing only one additional site for consideration: the Ridgefield interchange. In fact, the document fails to consider a range of alternatives that is adequate to satisfy the National Environmental Policy Act (NEPA). NEPA describes the consideration of alternatives as "the heart of the environmental impact statement" and requires the EIS process to consider multiple options. Case law has demonstrated that "(t)he existence of a viable but unexamined alternative renders an environmental impact statement inadequate" (Citizens for a Better Henderson v. Hodel, 9th Circuit).**

**It appears that Seattle developer and Cowlitz Tribe member David Barnett's ownership interest in the La Center site has affected the consideration of alternatives in the DEIS.**

**In fact an unexamined and viable alternative exists. In March 2006, ECONorthwest, a consultant group whose expertise is casino economics, prepared an analysis of a site near Vader, Washington, just off of I-5 at exit 60 in Lewis County, near the Cowlitz Indians' aboriginal home. The report, which ECONorthwest says would be applicable to other parcels of land in the same general area, would generate earnings well above what are necessary to compensate the Cowlitz Indian Tribe for needs unmet by federal sources. According to the ECONorthwest analysis, by the year 2013, the year after construction loans are paid off, the Cowlitz Tribe would receive between \$32.8 and \$34.8 million more from the Vader casino than they would need to satisfy the tribe's needs.**

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In addition I am concerned about the following:

\*\*\*\* Regardless of early reports that the DEIS seriously underestimates traffic impacts on the region generally, consider the effects casino traffic would have on the I-5 bridge alone. The bridge is already at near capacity several times each day with stop-and-go traffic on the rise. The average weekday traffic count in July 2005 was 137,000 vehicles. According to the Cowlitz DEIS, the presence of a casino at the La Center/I-5 junction would add to the transportation network:

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- An additional 13,616 weekday trips
- An additional 17,820 Saturday trips

And how does the DEIS address this major traffic snarl? It makes no recommendation. Nor does it attempt to address the financial impacts of delays, or impacts on secondary road systems, including maintenance. With or without the casino, an improved Columbia crossing is at least 10 years away.

\*\*\*\*The Cowlitz DEIS reports the casino-resort expects to hire approximately 3,151 employees, about as many as work for Clark County's largest employer, the Southwest Washington Medical Center. At an average wage of \$28,000, the pay is a full \$5,000 less than the Clark County average.

231-5

The DEIS goes on to say that the wage midpoint of the lowest paid 630 employees would be \$17,090. A three-member household qualifies for food stamps at a household income of \$20,920. A two-member household qualifies for food stamps at an income of \$16,660. Clearly, many families with a sole wage-earner working at the casino would need assistance.

As a part of its analysis of the socioeconomic section of the DEIS, casino consultant ECONorthwest notes, "The authors seem to have constructed their analyses to ensure they would arrive at a predetermined conclusion, which shows lesser impacts than an objective analysis would otherwise forecast." Their report notes a number of what they call "data deficiencies," apparently due to the Cowlitz tribe's failure to provide appropriate data for a "proper economic analysis," which compromised the integrity of the preparer's forecasts. The ECONorthwest review addresses four areas where these "data deficiencies" have a negative impact:

1. Understating job effects
2. Understating population impacts
3. Miscalculating retail sales
4. Understating housing effects

ECONorthwest reaches the conclusion that in order to reduce community concerns, every effort has been made to heighten fiscal benefits and reduce negative social impacts in the socioeconomic section of the DEIS.

\*\*\*\* The DEIS purpose and need is violated. The Purpose and Need section of the DEIS and Alternative A, the Preferred Casino-Resort Project at the La Center junction, are at odds. The Purpose and Need section speaks of facilitating "the establishment of a land base for the Tribe" and generating revenue to support "a variety of fundamental Tribal governmental, administrative, operational, social, and educational programs to benefit Tribal members, including building of governmental offices, a cultural center and Tribal elder housing."

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Yet, according to the 2000 Census, most tribal members live nowhere near the La Center junction where these services are to be established. In fact, fewer than 4% of Tribal members (50-74 persons) in Washington lived in Clark County at the time of the census. Most lived in Pierce, Thurston, Cowlitz, King and Lewis Counties, many miles to the north. This proposed reservation and casino is not being sought at La Center to restore lands and services to tribal members, but because of its proximity to potential gamblers in metropolitan Portland/Vancouver. This is an egregious example of "reservation shopping."

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Cont.

\*\*\*\* Is there really any need? Figures from the 2000 census throw into question the Purpose and Need section regarding need for the casino "to improve the long term economic vitality ... of the tribe and its members through the creation of a stable, sustainable source of employment and revenue." According to the census, most tribal members are doing quite well -- at least they were at the time the census was taken in 1999.

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The census showed that the Cowlitz Indian households had a median income of \$43,654. That was about 4% higher than the median income of all U.S. households, and although it was about 5% lower than Washington households, it was a whopping 35.5% higher than other American Indian households. Only 4.2% of Cowlitz families were below the federal poverty level, far better than the national level in 2000. Only 3.8% of Cowlitz Indians were unemployed when the Census was taken, well below the 5.8% rate across the country and even farther below the 6.2% unemployment rate at that time in Washington State.

\*\*\*\*\*The waste water treatment plan doesn't address the capacity of the East Fork of the Lewis River to absorb treated runoff and the impact on La Center's ability to absorb future growth to its sewage treatment facilities. If the Cowlitz Casino uses the available absorption, the river will be at capacity and no new growth could be channeled into the system. The river is not going to have its capacity increased. And any other option by the city of La Center will be very costly.

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\*\*\*\*The DEIS does not consider the effect and impact on the Chehalis tribal resort development that has been approved by the BIA north of Centralia.

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\*\*\*\*Nor does it adequately account for the impact on shallow level water tables in the Ridgefield / La Center area that service hundreds of households, and for whom wells are their only source of residential water.

231-10

Thank you

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