

***LETTER 27 (LOG # 372)***

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Murray Falk, La Center North Clark County Chamber of Commerce

July 5, 2006

Mr. Stanley Speaks, Regional Director  
Northwest Region  
Bureau of Indian Affairs  
911 NE 11th Ave.  
Portland, OR 97232

Re: Draft Environmental Impact Statement for the Proposed Cowlitz Tribal Casino in Clark County

Dear Mr. Speaks,

The La Center North Clark County Chamber of Commerce would like to go on record with our opposition to the Cowlitz Tribe's bid to build a mega casino in Clark County and our concerns with the DEIS they provided. We believe that the DEIS is flawed and tilted to favor the Cowlitz and that it does not accurately reflect the negative social and financial impacts such a development would cause.

372-1

The DEIS seriously underestimates the increase in traffic in our area. The I-5 Bridge is already at near capacity several times each day. 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 an additional 13,616 to 17,820 trips per day. The DEIS makes no recommendations for handling these traffic problems nor does it address the costs caused by increased delays and additional road upkeep.

372-2

Casino salaries and wages would be below the county average and low-wage jobs create a myriad of social impacts not fully addressed in the DEIS. The DEIS indicates that rental vacancy rates are extremely low in Clark and Cowlitz counties so housing would be an issue to be mitigated fully. With supply and demand of employees available in Clark County for a casino resort, if the Cowlitz/Mohegan partnership is anything like the model created at the Mohegan Sun Casino in Connecticut, additional workers would be imported from other countries, substantially impacting our housing markets, school systems, and transportation and social service agencies.

372-3

A Cowlitz La Center Casino would increase the number of problem gamblers in Washington and Oregon but would not provide adequate revenue to local governments to address their increased social needs and costs.

372-4

The DEIS 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 "the existence of a viable but unexamined alternative renders an environmental impact statement inadequate" (Citizens for a Better Henderson v. Hodel, 9th Circuit).

372-5

The Purpose and Need section of the DEIS 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." Yet, fewer than 4% of Tribal members (50-74 persons) in Washington lived in Clark County at the time of the 2000 census. Most of the Cowlitz population resides in Pierce, Thurston, Cowlitz, King and Lewis Counties. Regarding need, based on the same Census, 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.

372-6

A Tribal Casino in Clark County will drain business away from other venues including hotels, restaurants and entertainment attractions. Even non-competing businesses would be negatively impacted when discretionary dollars are spent on gaming. These businesses pay all their taxes, follow all state laws and are accountable to the community the way a tribal casino is not and should be protected.

372-7

In summary, we believe that the DEIS seriously minimizes many of the detrimental impacts a casino of the magnitude proposed by the Cowlitz/Mohegan partnership would have on our rural Clark County home and that it overstates the fiscal benefits. The sad and simple truth, we believe, is that this is a case of "reservation shopping", not to restore lands and services to tribal members.

372-8

Sincerely,

*Murray Falk*

Murray Falk, President  
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