

LETTER 39 (LOG # 498)

John McKibben, Greater Vancouver Chamber of Commerce



June 14, 2006

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

Dear Mr. Speaks,

Thank you for the opportunity to submit testimony commenting on the Draft Environmental Impact Statement (DEIS) prepared on behalf of the Cowlitz Tribe for its proposed construction of a large casino near La Center, WA.

Environmental Impact Statements (EIS) are required to assess the impacts of a given proposal on the environment and community and propose mitigation for those impacts. An EIS is also required to provide alternatives to the "preferred alternative." Finally, through the DEIS process, public testimony must be considered when weighing the proposal, alternatives in the DEIS document and their merits.

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The Greater Vancouver Chamber of Commerce is the region's largest business organization, serving as the voice of business since 1890. The Chamber provides leadership and advocacy for more than 55,000 men and women in business in the Greater Vancouver metropolitan area. The Chamber's mission is to provide positive business leadership that results in economic vitality for businesses, their employees and the community.

The Chamber's Board of Directors appointed a task force to review the Draft Environmental Impact Statement (DEIS) prepared for the Cowlitz Tribe Casino and Trust Acquisition proposed for the La Center Junction.

In keeping with the Chamber's mission, Task Force members based their findings and recommendations on the following question: "Is the casino project as proposed in the best interest of Clark County businesses and the citizens of Clark County?"

The task force finding is no, there is a better use of the site.

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See attachment:
 GVCC Casino Task Force Findings and Recommendations

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The DEIS puts forth six options:

- Alternative A: Preferred Casino-Resort Project
- Alternative B: Preferred Casino-Resort Project Without Rerouting NW 319th Street
- Alternative C: Reduced Intensity
- Alternative D: Business Park
- Alternative E: Ridgefield Interchange Site
- Alternative F: No Action

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cont.

Alternative D – Business Park is described in the DEIS as: *“a non-gaming alternative that consists of the construction of a business park with proposed uses such as office, industrial flex-space and accessory commercial uses on the same project site identified in Alternative A. Approximately 1,590,800 square feet of space would be constructed with parking for approximately 3,700 vehicles. No on-site wastewater treatment plant is proposed for this alternative.”*

The GVCC Task Force, Public Affairs Committee and the Greater Vancouver Chamber of Commerce Board support the DEIS “Business Park Alternative D” because according to the DEIS it offers:

- Higher wages with a greater annual operating payroll impact
- Low/no crime
- No negative impact on property values
- Less impact on the environment
- No negative impacts on local businesses
- Fewer negative impacts on traffic

The unasked question the GVCC has for the Cowlitz Tribe, the BIA, and the Southwest Washington community is: **Why should Clark County residents accept an alternative that offers anything less than the best future for our citizens?**

- Why should we support an alternative with greater negative impacts for crime?
- Why would we accept greater negative impacts for traffic?
- Why would we accept greater negative impacts on the property values of surrounding land?
- Why would we accept greater negative impacts for surrounding businesses?
- Why would we accept greater negative impacts on the environment?
- Why would we accept jobs that can't support families?
- Why would we support a use inconsistent with the state Growth Management Act?

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Further, if this project is meant to be good for the Cowlitz people *and* the entire community, why wouldn't the tribe and the community support the alternative that pumps \$59 million additional dollars per year above the casino alternative in local wages into our economy and creates \$49,000 average annual wage jobs rather than \$28,000 (including tips) annual wage jobs?

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There can be only one answer to these questions. Alternative A produces a larger profit margin for the Cowlitz. If this is only about the size of profits, then Alternative A is the answer. But, the Greater Vancouver Chamber of Commerce believes this should be about the well being of the Cowlitz and the citizen of Clark County. It should not be about short term profits, but rather, the long-term benefits for tribal members and the entire community.

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Unlike the casino alternative, the Business Park Alternative D option as put forth in the DEIS document supports long-term economic development efforts and infrastructure enhancements suitable for the area. The addition of a business park would also serve as an anchor to the Discovery Corridor already planned for the surrounding area.

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The Chamber commends the Cowlitz Tribe for including such a viable non-gaming alternative in the DEIS document. This alternative is fully consistent with the Chamber's call over the past three years for the creation of more high paying jobs in Clark County to grow a balanced local economy.

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The Greater Vancouver Chamber of Commerce is prepared to work hand-in-hand with the Cowlitz Tribe and the community to develop Alternative D to its full potential sooner, rather than later and ensure its success through collaboration and cooperation.

Sincerely,



John McKibbin, President/CEO
Greater Vancouver Chamber of Commerce

[STREET ADDRESS] • [CITY/STATE] •
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Cowlitz Casino Proposal Findings and Recommendations

June 13, 2006



I. Abstract

The Greater Vancouver Chamber of Commerce Board of Directors appointed a task force to review the Draft Environmental Impact Statement (DEIS) prepared for the Cowlitz Tribe Casino and Trust Acquisition proposed for the La Center Junction.

Task Force members based their findings and recommendations on the following question: "Is the casino project as proposed in the best interest of Clark County businesses and the citizens of Clark County?"

The task force finding is no, there is a better use of the site.

On June 8, 2006 the Greater Vancouver Chamber of Commerce Public Affairs Committee voted unanimously to recommended that the Board support Alternative D as presented by the Task Force.

On June 13, 2006, the Greater Vancouver Chamber of Commerce Board of Directors voted unanimously to support build-out of Alternative D as presented in the Cowlitz Casino DEIS.



II. Executive Summary

The Greater Vancouver Chamber of Commerce Task Force reviewed the Draft Environmental Impact Statement (DEIS) prepared for the Cowlitz Tribe Casino and Trust Acquisition proposed for the La Center Junction.

The DEIS put forth six options:

- Alternative A: Preferred Casino-Resort Project
- Alternative B: Preferred Casino-Resort Project Without Rerouting NW 319th Street
- Alternative C: Reduced Intensity
- Alternative D: Business Park
- Alternative E: Ridgefield Interchange Site
- Alternative F: No Action

Task Force members reviewed all six options. In their review, they addressed the question "Is the casino project as proposed in the best interest of Clark County businesses and the citizens of Clark County?"

*The task force finding is that **Alternative D (Business Park)** is the best option.*

Alternative D – Business Park is described in the DEIS as: "a non-gaming alternative that consists of the construction of a business park with proposed uses such as office, industrial flex-space and accessory commercial uses on the same project site identified in Alternative A. Approximately 1,590,800 square feet of space would be constructed with parking for approximately 3,700 vehicles. No on-site wastewater treatment plant is proposed for this alternative."

The GVCC Task Force recommends that the Greater Vancouver Chamber of Commerce Public Affairs Committee support DEIS "Business Park Alternative D" and recommend GVCC endorsement of DEIS Business Park Alternative D to the Chamber's Board of Directors. Alternative D Business Park proposal is the best option for tribal members, the business community and Clark County citizens because it offers:

- Higher wages with a greater annual operating payroll impact
- Low/no crime
- No negative impact on property values
- Less impact on the environment
- No negative impacts on local businesses
- Fewer negative impacts on traffic

On June 8, 2006 the Greater Vancouver Chamber of Commerce Public Affairs Committee voted unanimously to recommend that the Board support Alternative D as presented by the Task Force.

On June 13, 2006, the Greater Vancouver Chamber of Commerce Board of Directors voted unanimously to support build-out of Alternative D as presented in the Cowlitz Casino DEIS.



Background

In April 2006 the Greater Vancouver Chamber of Commerce Board of Directors appointed a task force to review the Draft Environmental Impact Statement prepared for the Cowlitz Tribe Casino and Trust Acquisition proposed for the La Center junction.

The Task Force was asked to review the DEIS prepared for the Bureau of Indian Affairs (BIA) for the 152-acre Cowlitz Casino development at the La Center junction; review Memorandums of Understanding (MOUs) and other relevant information; and recommend to the GVCC Board a position in support of, in opposition to, or neutral to the proposed casino.

Task Force members based their findings and recommendations on the following question: "Is the casino project as proposed in the best interest of Clark County businesses and the citizens of Clark County?"

Business Park Alternative D is the only non-casino option other than the "no action" alternative included in the DEIS. The Business Park alternative was also outlined in early scoping documents prepared by the tribe during its March 2004 environmental assessment submitted to the BIA.

The recommendation to the GVCC Board of Directors was based on the preponderance of information reviewed by the Task Force in support of the group's recommendation. *The Task Force did not consider the moral question of gambling or the social impact of gambling on the community as part of its review.*



III. Findings

Task Force Findings

- Business Park Alternative D supports the goals of Clark County's Growth Management Act, whereas a casino does not.
- Business Park Alternative D supports long-term economic-development efforts and infrastructure enhancements suitable for the area. The addition of a business park would not negatively affect existing businesses.
- Business Park Alternative D would serve as an anchor to the Discovery Corridor already planned for the surrounding property.
- The DEIS states that there is no definitive link between casino and increased crime rates (and thereby increased law-enforcement cost) other than those associated with an increased population. The Task Force disagrees with this finding and believes that law enforcement costs would be significantly lower with Business Park Alternative D.

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IV. Supporting Facts: Published DEIS Comparisons

The following facts supporting the GVCC Task Force recommendation are limited to a comparison of Alternative A (Preferred Casino-Resort Project) and the Task Force recommendation, Alternative D (Business Park).

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Higher-wage jobs

Business Park Alternative D: Expected employment for 2,991 employees with an average wage of \$49,000 and a total annual payroll of \$146.6 million.

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Casino Alternative A: Expected employment of 3,151 employees with average wage of \$28,000 and full benefits; annual payroll of \$88 million.

Low/No crime

Business Park Alternative D: No impact on cost of law enforcement

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Casino Alternative A: The tribe has committed in an MOU to reimburse Clark County and to enter into agreement with the Clark County Sheriff's Office to reimburse costs of a potential increase in demand for law enforcement from increased population.

No negative impact on property values

Business Park Alternative D: Negative-value impacts to nearby properties would not occur under this alternative as the area is already designated for future urban/industrial development, including Business Park Alternative D uses.

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Casino Alternative A: Negative-value impacts could occur to nearby properties if they are affected by noise, traffic, shadow, light, or glare.

Less environmental impact

Business Park Alternative D:

- Clark Public Utilities has the supply and pressure capabilities to serve this alternative and has agreed to supply water pursuant to the MOU and a service agreement letter.
- At peak day demand, this alternative would use approximately 50,000 gallons per day from the CPU.
- Onsite disposal is not necessary under this alternative.

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Casino Alternative A:

- Clark Public Utilities has supply & pressure capabilities.
- At peak day demand, would use approximately 765,000 gallons per day.
- On-site treatment plant would treat/recycle wastewater.

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cont.

Fewer negative impacts on traffic

Business Park Alternative D:

- It is projected that there will be an additional 16,829 weekday daily trips to the circulation network and an additional 2,865 daily trips on Saturday.
- NW 319th St. would **not** be realigned under this alternative.

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Casino Alternative A:

- Approximately 13,600 weekday daily trips would be added and 17,800 daily trips would be added on Saturday.
- This alternative may require the realignment of NW 319th St. south of its existing alignment, connecting it with NW 41st Ave. as currently designed and re-joining the current alignment at the I-5 southbound on-and-off-ramps intersection.



**Addendum A:
Alternative A / Alternative D Impacts**

Resource	Potential Impacts-Alternative A	Potential Impacts-Alternative D
Water Resources		
Stormwater runoff & quality	<ul style="list-style-type: none"> Increased stormwater runoff due to increased impervious surfaces (e.g. roofs, concrete). Stormwater control facilities included in project design would reduce peak stormwater flows and filter runoff. 	<ul style="list-style-type: none"> Same as for Alternative A
Wastewater	<ul style="list-style-type: none"> On-site treatment plant would treat/recycle wastewater. Discharge of treated wastewater would comply with most stringent state standards; discharge to seasonal stream on site may improve its water quality. 	<ul style="list-style-type: none"> Onsite disposal of wastewater is not proposed under this alternative. There would be no impacts to surface water from wastewater discharge.
Air Quality		
Operational emissions	<ul style="list-style-type: none"> Would result in generation of VOC (volatile organic compounds), NOx (nitrogen oxides), and PM-10 (inhalable particulate matter) 	<ul style="list-style-type: none"> Same as for Alternative A
Biological Resources		
Federally listed animal species	<ul style="list-style-type: none"> Eight special status fish species may be affected due to increase in effluent discharge and stormwater runoff into unnamed seasonal stream which flows into the East Fork of the Lewis River. 	<ul style="list-style-type: none"> Eight special status fish species may be affected due to increase in stormwater runoff into the unnamed seasonal stream on site, a tributary to the East Fork Lewis River.
Migratory birds	<ul style="list-style-type: none"> During nesting season, nests could be affected by vegetation removal during construction. Permanent features (e.g., night lighting) may impact. 	<ul style="list-style-type: none"> Same as for Alternative A
Socioeconomics		
Construction Impacts	<ul style="list-style-type: none"> Construction would generate approximately 4,011 jobs with average wage of \$46,200; total payroll of \$185 million. 	<ul style="list-style-type: none"> Approximately 999 jobs would be generated over the entire construction period with an average wage of \$46,200 and a total payroll of \$46,170,000.
Operational Impacts	<ul style="list-style-type: none"> Expected employment of 3,151 employees with average wage of \$28,000 and full benefits; annual payroll of \$88 million. Approximately 90% of employees anticipated to be current Clark or Cowlitz County residents. 	<ul style="list-style-type: none"> Expected employment for 2,991 employees with an average wage of \$49,000 and a total annual payroll of \$146,605,000. The number of employees that would already reside in Clark and Cowlitz counties depends on the businesses that choose to occupy the business park, but is anticipated to be within 90% as with the casino.

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Resource	Potential Impacts- Alternative A	Potential Impacts- Alternative D
Socioeconomics <i>(continued)</i>		
Local jurisdictions	<ul style="list-style-type: none"> Community members would benefit from increased spending and revenues, including sales tax on approximately \$39 million in construction purchases. Memorandum of Understanding with Clark County includes special funds for community benefit, such as 2% for arts and education. 	<ul style="list-style-type: none"> Community members would benefit from increased spending and economic opportunities off site, including revenue from the sales tax on construction purchases totaling an estimated \$9,790,000. Memorandum of Understanding with Clark County includes collection of sales tax on non-Indian sales and to make payments in lieu of property taxes to the County.
Property values	<ul style="list-style-type: none"> Negative value impacts could occur to nearby properties if they are affected by noise, traffic, shadow, lights, or glare. However, impacts and pressure to convert agricultural land to service economy may increase value of undeveloped land. 	<ul style="list-style-type: none"> Negative value impacts to nearby properties would not occur under this alternative as the area is already designated for future urban/industrial development, including business park uses.
Mini-casinos/ cardrooms	<ul style="list-style-type: none"> Substitution effect is expected to result in 61% decrease in mini-casino revenues to City of La Center. 	<ul style="list-style-type: none"> Not applicable
Social effects	<ul style="list-style-type: none"> Four mini-casinos already present in La Center; gambling not new to community. Tribe has agreed to contribute no less than \$50,000 annually to service programs for problem gamblers. No definitive link between casino and increased crime rates; Tribe has committed in MOU to reimburse Clark County and to enter into agreement with Sheriff's Office to reimburse costs of potential increase in demand for law enforcement from increased population (see impacts on law enforcement discussed below). 	<ul style="list-style-type: none"> Not applicable
Community Infrastructure	<ul style="list-style-type: none"> Minimal impacts expected to schools and libraries. Tribe will pay school impact fees to Ridgefield School District if it constructs single or multi-family housing. 	<ul style="list-style-type: none"> Same as for Alternative A

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Resource	Potential Impacts- Alternative A	Potential Impacts- Alternative D
Socioeconomics (continued)		
Transportation	<ul style="list-style-type: none"> • Approximately 13,600 added weekday daily trips and 17,800 daily trips on Saturday. • Six intersections would operate below Level of Service D (high density, stable flow) during AM, PM, and Saturday peak hours. • La Center and Ridgefield interchanges part of High Accident Corridor due to traffic backups on to I-5 mainline. 	<ul style="list-style-type: none"> • 16,829 added weekday daily trips to the circulation network and 2,865 daily trips on Saturday. • Seven intersections would operate below Level of Service D (high density, stable flow) during AM, PM, and Saturday peak hours. • La Center and Ridgefield interchanges part of High Accident Corridor due to traffic backups on to I-5 mainline.
Land Use	<ul style="list-style-type: none"> • County has already planned for industrial/urban development on property. 	<ul style="list-style-type: none"> • Same as for Alternative A
Public Services		
Water Supply	<ul style="list-style-type: none"> • Clark Public Utilities (CPU) has supply & pressure capabilities. At peak day demand, would use approximately 765,000 gallons per day. • An on-site reservoir with a capacity of at least 400,658 gallons would be required to ensure adequate fire flows. 	<ul style="list-style-type: none"> • CPU has the supply and pressure capabilities to serve this alternative and has agreed to supply water pursuant to the MOU and a service agreement letter. • At peak day demand, this alternative would use approximately 50,000 gpd from CPU. • An on-site reservoir with a capacity of at least 120,000 gallons would be required to ensure adequate fire flows of 2,500 gpm for 2 hours.
Wastewater	<ul style="list-style-type: none"> • Tribe to provide sewage conveyance, treatment, and disposal through development of new independent treatment plant meeting/exceeding federal and state standards. 	<ul style="list-style-type: none"> • No on-site wastewater treatment plan is proposed.
Law enforcement	<ul style="list-style-type: none"> • Increased population may increase demands on law enforcement. 	<ul style="list-style-type: none"> • Same as for Alternative A
Fire protection/ EMS	<ul style="list-style-type: none"> • Operation would add to firefighting responsibilities in the area and increase the need for fire and emergency services. 	<ul style="list-style-type: none"> • Same as for Alternative A
Noise		
Operational noise	<ul style="list-style-type: none"> • On-site operational noise would comply with state limits. 	<ul style="list-style-type: none"> • Same as for Alternative A

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Resource	Potential Impacts- Alternative A	Potential Impacts- Alternative D
Aesthetics		
Visual impacts	<ul style="list-style-type: none"> Viewshed B (high-end rural residential houses on large lots) would be impacted. 	<ul style="list-style-type: none"> Same as for Alternative A
Shadow, light, & glare	<ul style="list-style-type: none"> New sources of light would be introduced, but use of downcast and directed lighting, low-pressure sodium bulbs, and strategically positioned lighting fixtures would minimize off-site impacts. 	<ul style="list-style-type: none"> Same as for Alternative A
Community character	<ul style="list-style-type: none"> Gaming businesses already established in community; with other anticipated developments in area, impacts would be minimal. 	<ul style="list-style-type: none"> Would introduce industrial and commercial elements to the site. However, the area is anticipated for urbanization. With other anticipated developments in the area, the impacts to community character would be minimal.

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