

# SECTION 2.0

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## ALTERNATIVES

### 2.1 INTRODUCTION

This section describes the alternatives that are analyzed within this Environmental Impact Statement (EIS). These alternatives include five development alternatives as well as the No Action Alternative. Consistent with Council on Environmental Quality (CEQ) guidelines (40 CFR Section 1502.14), this section includes a detailed discussion and comparison of the alternatives analyzed in this EIS. Alternative locations that were considered but are not analyzed in this EIS are also described.

The development alternatives selected for analysis meet the purpose and need as described in **Section 1.2**. They are derived from the screening and scoping process. Four of the five development alternatives, if chosen, would be built on the La Center Interchange Site and would include placing approximately 151.87 acres into Federal trust status. The remaining development alternative, if chosen, would be built on the Ridgefield Interchange Site and would include placing approximately 163.02 acres into Federal trust status.

### 2.2 ALTERNATIVE A – PREFERRED CASINO-RESORT PROJECT

Alternative A consists of the following components: (1) placing approximately 151.87 acres into Federal trust status; (2) issuance of a reservation proclamation by the Department of the Interior; (3) approval of a gaming development and management contract; (4) development of a casino-resort, including ancillary components such as parking and a wastewater treatment plant; and (5) development of Tribal headquarters, Tribal elder housing and a Tribal cultural center. This alternative, which constitutes the Preferred Alternative and the Tribe's and the Bureau of Indian Affairs' (BIA) Proposed Project, most suitably meets all aspects of the purpose and needs of the Proposed Action by promoting the Tribe's long-term economic development and self-governance capability. Components of the Proposed Project are described below.

#### 2.2.1 LAND TRUST ACTION AND RESERVATION PROCLAMATION

The Secretary of the Interior has authority under the Indian Reorganization Act (IRA) of 1934 to acquire land in trust and to issue reservation proclamations. The IRA was passed in part to remedy the results of the General Allotment Act of 1887, commonly known as the Dawes Act, which removed the restrictions on the alienation of Indian land and resulted in the loss of 90 million acres of

land from Indian ownership. Since enactment of the IRA, the Secretary of the Interior has used its authorities to restore approximately 6 million acres of land (approximately 7% of the lands lost) in Federal trust status on behalf of Indian tribes. The BIA is the Federal agency charged with reviewing and approving tribal applications on behalf of the Secretary of the Interior to take land into Federal trust status.

The trust acquisition would be made in accordance with the procedures set forth in 25 CFR Part 151. The regulations require that the BIA assess the purpose, need and anticipated benefits to the Tribe of the acquisition, as well as the potential tax, jurisdictional, and land use impacts on State and local governments. If the BIA determines that the proposal meets all statutory and regulatory requirements, and that acquisition of the parcels would be appropriate based on its analysis of the regulatory factors, it may approve the Tribal Government's application and take the proposed lands into trust.

The Indian Gaming Regulatory Act (IGRA) permits a Federally-recognized Indian tribe to conduct gaming on "Indian lands" over which the tribe possesses governmental jurisdiction. "Indian lands" are lands in trust status or within a Tribe's reservation, over which the tribe has governmental authority. A reservation proclamation is one means of establishing a tribe's governmental authority over land that has come into trust. In addition, a reservation proclamation clearly establishes that the land is "Indian country" with all the associated tribal civil and criminal jurisdictional authority. Most importantly for purposes of a recently recognized tribe like Cowlitz, a reservation proclamation is the vehicle used by the BIA for determining that a parcel may be considered the "initial reservation" of a tribe recognized through the BIA's federal acknowledgment process under Section 20(b)(1)(B) of IGRA. An initial reservation determination under IGRA Section 20 would allow the Tribe to game on the land despite IGRA's general prohibition against gaming on lands acquired in trust after 1988.

The BIA will make decisions concerning the Tribe's request for a reservation proclamation based on information contained in the Tribe's application for trust acquisition under 25 CFR Part 151, as well as information contained in this EIS.

In addition to requesting that the Secretary of the Interior proclaim the parcels to be the Tribe's initial reservation, the Tribe has also submitted a site-specific Class III gaming ordinance to the National Indian Gaming Commission (NIGC) for its review and approval (DEIS Vol. I, **Appendix D**). As part of its review of that ordinance, NIGC looked at the question of whether, if the parcels were taken into trust, they would qualify as "lands restored to a tribe restored to federal recognition" and be eligible for gaming pursuant to Section 20 of IGRA. NIGC has determined that the parcels would so qualify, allowing the NIGC to approve the gaming ordinance (NIGC, 2005).

## 2.2.2 DEVELOPMENT AND MANAGEMENT CONTRACT

Congress enacted the IGRA (25 CFR Sections 2701 - 2721) with the stated purpose of providing a statutory basis for the operation and regulation of gaming by Native American tribal governments. As part of its regulatory function, NIGC, which was established under IGRA, is charged with the authority to approve management contracts between tribal governments and outside management groups. To approve such a contract, the NIGC must comply with the National Environmental Policy Act (NEPA), and assess the effect the Proposed Project would have on human health and the environment. To approve a management contract, the NIGC must determine that the contract is consistent with IGRA in terms of contract period, management company payment, and protection of tribal authority. The NIGC also conducts extensive background checks on the management company's key personnel.

The NIGC provides regulatory oversight of tribal gaming operations to ensure the safety of the operations and integrity of the games. As part of this regulatory function, the NIGC has promulgated minimum control requirements for the operation of a tribal gaming facility. Under the applicable provision of 25 CFR Section 573.6(a)(12), the NIGC can issue an order of temporary closure of all or part of an Indian gaming operation if "[a] gaming operation's facility is constructed, maintained, or operated in a manner that threatens the environment or the public health and safety, in violation of a Tribal ordinance or resolution approved by the Tribal Chairman under part 522 or 523 of this chapter."

The proposed management contract between the Tribe and the management company, Salishan-Mohegan, LLC, would assist the Tribe in obtaining funding for the development of the proposed Tribal gaming complex. Once the facility becomes operational, Salishan-Mohegan, LLC would have the exclusive right to manage day-to-day operations of the casino-resort complex for a period of time. Salishan-Mohegan, LLC must comply with the terms of IGRA and the NIGC's regulatory requirements relating to the operation of the Tribal gaming facility. The Tribal Government maintains the ultimate authority and responsibility for the development, operation and management of the casino pursuant to IGRA, NIGC regulations, the Tribal Gaming Ordinance (DEIS Vol. I, **Appendix D**) and the Tribal/State Compact (which would be negotiated with the State of Washington).

## 2.2.3 CASINO-RESORT COMPLEX

Alternative A would include casino and hotel facilities, parking facilities, a recreational vehicle (RV) park, Tribal headquarters, Tribal elder housing, Tribal cultural center, and a wastewater treatment plant. The proposed facilities would occupy most of the project site. A site plan for the proposed facilities is presented as **Figure 2-1**. Architectural renderings are presented as **Figures 2-2** and **2-3**. Proposed elevations are presented as **Figures 2-4** and **2-5**. The project plans call for 134,150 square

**Figure 2-1**

**Figure 2-2**

**Figure 2-3**

**Figure 2-4**

**Figure 2-5**

feet of gaming floor (including 3,000 video lottery terminals [VLTs], 135 gaming tables, and 20 poker tables); 355,225 square feet of restaurant and retail facilities and public space; 147,500 square feet of convention and multi-purpose space (with seating for up to 5,000); a 250 room hotel; and Tribal facilities including a 20,000 square foot Tribal government office building, a 12,000 square foot Tribal cultural center, and approximately 16 Tribal elder housing units. **Table 2-1** lists the components of the casino and hotel facilities alongside square footage allocations and seating capacities. It is possible that development of the casino and hotel facilities would be phased to some extent; to allow limited development of a temporary casino facility with a more limited number of gaming positions while the permanent casino and hotel are under final design, permitting, construction, inspection and the initiation of operations. One factor, which could result in the initiation of a smaller, temporary facility includes the availability of the proposed 3,000 VLTs.

Under Alternative A, NW 319<sup>th</sup> Street would be rerouted (with the agreement of Clark County) to a more southerly location across the project site to allow for construction of the casino and hotel facilities on the northern portion of the property without infringing on wetlands or wetland buffer areas.

### *CASINO*

The casino facility would be housed in a two-story structure with a subterranean level built into the sloped site. The architecture would be of a contemporary nature but would incorporate many of the natural materials of the general region including stone and wood. The main entry level would house the gaming floor and associated public spaces, including food and beverage, retail, and entertainment. The casino support facilities (back-of-house) would also be on the main floor as would the three porte cocheres (valet areas for guest drop-off and pick-up). The second level would primarily consist of general and administrative offices. The subterranean level would consist of two levels of valet parking, a bus depot, a multi-purpose room, and meeting and convention facilities. The remaining subterranean area would consist of general offices, employee services, and miscellaneous additional casino support areas.

### *HOTEL*

The hotel would consist of eight floors, each floor having an area of approximately 18,810 square feet for a total hotel square footage of 150,480. There would be 250 guest rooms. The hotel, like the casino, would be of a contemporary nature but would incorporate many of the natural materials of the general region including stone and wood. The main hotel entrance would be on the west side, adjacent to the hotel porte cochere.

**TABLE 2-1**  
ALTERNATIVES A AND B CASINO-HOTEL USE AREAS

<b>Area</b>	<b>Square Footage</b>	<b>Capacity</b>
<b>Casino</b>		
Gaming Floor	134,150	
Dining (10 Outlets)	95,225	
Bars/Entertainment	35,600	
Food and Beverage Support/Kitchen/Pantries	49,360	
Retail	165,000	
Public Space and Restrooms	19,000	
Convention Space	85,000	
Multi-purpose Room	62,500	5,000 seats
Cage/Count Room	9,050	
Casino Support (Back-of-House)	20,500	
Administration Services	99,200	
General Offices	19,970	
Employee Services	41,300	
Building Services	156,900	
Misc. and Circulation	40,400	
<b>Hotel</b>		
Guest Rooms	150,480	250 keys
<b>Parking</b>		
Self-Park Garages (2)		5,500
Valet Parking (subterranean level)		1,750
<b>Total Square Footage</b>	<b>1,183,635</b>	

NOTE: All figures are approximate.  
Source: Bergman, Walls & Associates, Ltd., 2005.

### ***ANCILLARY COMPONENTS***

#### ***Parking***

Alternative A includes two self-park garages, each containing 2,750 parking spaces for a total of 5,500 spaces. Employee parking would also be contained in these garages. In addition, there would be 1,750 Valet Parking spaces in the subterranean level for a total of 7,250 spaces.

#### ***Recreational Vehicle Park***

The RV park would consist of a large paved parking area with spaces for 200 recreational vehicles. Two laundry facilities would be provided, as well as a clubhouse, one outdoor pool and two spas, play areas, an administrative office, and a dump station for sewer hookup. The RV park would be located in the southwestern portion of the project site. A security building would be located at the entrance to the campsites adjacent to the clubhouse.

### ***Signage, Lighting, and Landscaping***

The exterior signage would be an integral part of the exterior architectural design. Signs would be compatible with the buildings' architecture as well as the natural characteristics of the site.

The exterior lighting of the project would be an integral part of the design and strategically positioned to minimize off-site lighting and any direct site lines to the public. The lighting fixtures would be integrated into components of the architecture to eliminate direct contact from the customer's eyes to the actual light source. While many types of lighting would be used throughout the exterior of the project, the majority would be high pressure sodium, which provides a softer, yellow/golden light. This type of lighting is much less conducive to harsh glare.

The architectural design of the project would be enhanced by the landscaping, using plant material native to the region.

### ***Water Supply***

Clark Public Utilities (CPU) has agreed to provide water to the project independent of language in the Memorandum of Understanding (MOU) (DEIS Vol. III, **Appendix BB**). This will be consistent with Section 9.3 of the MOU between the Tribe and Clark County (DEIS Vol. I, **Appendix C**) and Section 3(F) of the Tribe's Environment, Public Health and Safety (EPHS) Ordinance (**Appendix U** of the FEIS). The project site is in the CPU district but the utility does not currently supply water to the location. Water demand calculations for this alternative are discussed in **Section 4.10**, Public Services. A supplemental water engineering report has been prepared for the Proposed Project and is incorporated as **Appendix F** of the FEIS. For Alternative A, it is recommended that development of the on-site water distribution system consist of a network of 8-inch diameter pipes to buildings and fire hydrants.

### ***Recycled Water***

Recycled water would be utilized where appropriate to reduce the demand for water supply from CPU by up to 67%. Potential uses for recycled water include toilet flushing, landscape irrigation, emergency fire flow/fire sprinklers, and cooling water for the cooling tower. A 750,000-gallon closed-tank reservoir and booster pump station would be connected to a recycled water system saving approximately 300,000 gallons of supply water. In the event of a low reservoir level a backup connection would supply water from the potable system.

### ***Wastewater Treatment and Disposal***

In accordance with Section 9.0 of the MOU between the Tribe and Clark County (DEIS Vol. I, **Appendix C**) and Section 3(F) of the Tribe's EPHS Ordinance (**Appendix U** of the FEIS), the Tribe would provide wastewater conveyance, treatment, reuse, and disposal through development of a new

independent wastewater treatment plant constructed by the Tribe on the project site. Existing septic systems on the site would be removed. The facilities would operate to meet or exceed Washington State Department of Ecology (DOE) and Department of Health (DOH) water quality standards including the Water Reclamation and Reuse Standards and National Pollutant Discharge Elimination System (NPDES) permitting program, which would be applicable if the development were to occur on non-Indian land. Additionally, no use of the proposed facilities would take place on site until wastewater facilities are complete, inspected, and deemed compliant with applicable standards.

**Table 2-2** shows the estimated average and peak day wastewater flows for Alternative A. The components of Alternative A would have an estimated average daily flow of 310,122 gallons per day (gpd) (Olson Engineering, 2006b) (DEIS Vol. II, **Appendix G**). Based on this estimate, the average daily design flow is 310,000 gpd, or 215 gallons per minute (gpm), with a peak day design flow of 499,000 gpd, or 347 gpm. The peak hourly design wastewater flow is calculated at 753 gpm. The peak day design flow assumes that the facilities are operating at maximum capacity.

**TABLE 2-2**  
DESIGN WASTEWATER FLOWS – ALTERNATIVES A AND B

Criteria	Gallons Per Day (gpd)	Gallons Per Minute (gpm)
Average daily flow	310,000	215
Daily peak flow	499,000	347
Hourly peak flow	--	753

NOTES: Assumes peaking factor of 1.61 times average day flow and 3.5 times average hourly flow.  
Source: Olson Engineering, 2006b.

Under Alternative A, on-site collection of wastewater would consist of gravity lines that would transfer wastewater from buildings to a sanitary pump station located adjacent to the northeast side of Parking Garage #1. From there, wastewater would be pumped via pipelines beneath the roads to a treatment plant located in the southeast of the project site between I-5 and NW 31<sup>st</sup> Avenue. Due to area constraints and requirements for surface discharge, the recommended treatment plant is a membrane bioreactor plant (MBR) with ultraviolet (UV) light disinfection of the effluent. From the treatment plant, treated wastewater effluent would be pumped to the 750,000-gallon closed-tank reservoir for reuse. Treated effluent would meet water quality guidelines as discussed further in **Section 4.3, Water Resources**. An NPDES permit from the U.S. Environmental Protection Agency (USEPA) would be required for the discharge of untreated wastewater to the unnamed stream.

Components of the wastewater treatment plant would include headworks (flow measurement and screening systems), immersed MBRs, UV disinfection, sludge stabilization basins, a supernatant recycle pump station, an operations building, and a berm around the boundary. The proposed system

would treat the estimated peak flow of 0.5 million gallons a day (mgd) (Olson Engineering, 2006b (DEIS Vol. II, **Appendix G**). The sewage lift station would include a foul air collection and scrubbing system to control odors. Emergency power would be provided by a separate on-site generator or an emergency generator at the casino facility. A contingency plan would be incorporated into the design and operation of the WWTP in response to mechanical failures at the WWTP. All components within the onsite wastewater treatment plant will have redundant systems to allow maintenance and repair while keeping the wastewater treatment plant online. In the case of multiple system failures making the wastewater treatment plant inoperable, sewage would be pumped from the holding tank and trucked to another wastewater treatment plant.

A local utility or private operations firm would operate and maintain the wastewater treatment facility with at least one full-time employee. Operation and maintenance of a wastewater treatment plant requires a qualified operator, continuous monitoring, reporting and a commitment to treating wastewater to the highest quality at all times. A description of the treatment plant components follows.

#### *Headworks*

This part of the system consists of an influent pipe that is routed through a flow meter and into the screening facility. The screening facility includes a 3-millimeter (mm) self-cleaning screen that protects the ultra-filtration membranes. The headworks area is covered and scrubbed for odor removal. Screened solids will go to the biosolids stabilization basin.

#### *Anoxic Zone*

The anoxic zone consists of equalization tanks or covered holding tanks designed to handle peak flows to the MBR tanks. Tanks can be isolated to allow for maintenance. Nitrate removal occurs in the anoxic basin by an anoxic suspended growth bacterial process where nitrates are converted to nitrogen gas. From the equalization tanks the wastewater flows to aeration tanks. Tank sludge goes to the Biosolids stabilization basin.

#### *Aeration Tank with Submersed Membranes*

In the aeration tanks, ammonia is converted to nitrates through the use of a fine bubble diffuser system that provides mixing and oxygen. Air is supplied by blowers. The membranes are submerged in the aeration tank while water is drawn through the membranes under vacuum. Filtered water that passes through the membranes is called permeate which is routed to the UV treatment system.

The MBR system is operated at a higher concentration of solids than conventional activated sludge. This is ideal for treating high strength wastewater with varying flows typical of casino wastewater.

Sludge from the aerated tank is sent to either the biosolids stabilization basin or back to the equalization tank for further treatment.

#### *UV Disinfection*

The UV disinfection facilities provide disinfection for wastewater prior to surface disposal or recycled water uses. These facilities are located adjacent to the MBR tanks and accomplish the disinfection by a bank of UV lamps contained in a stainless steel channel. The benefit of UV disinfection is that it eliminates the need of disinfectant chemicals such as sodium hypochlorite. UV disinfection will lower coliform levels to those required for Class A reuse water.

#### *Biosolids Stabilization Basin*

The biosolids stabilization basin will be sized to stabilize, thicken, and process biosolids for approximately 10 years without cleaning. When cleaning is needed, the biosolids would go through a thickening process before they are dried and then disposed of in a landfill or dedicated sludge disposal site.

#### *Operations Building and Berm*

An operations building would contain plant controls and blowers. The building would also contain office, laboratory, and chemical storage and handling facilities. The berm around the wastewater treatment facility would provide a buffer from neighboring properties. The berm will be formed from the material excavated to create the stabilization basin and treatment plant.

#### *Disposal*

Based on estimated water demands and wastewater flows, a portion of treated wastewater would be recycled for toilet flushing, landscape irrigation, fire flows, and cooling water for the cooling towers, especially during the dry season when landscape irrigation rates are highest. However, the remainder of treated wastewater would be discharged year-round near the stormwater discharge line for Storm Facility B at the unnamed seasonal stream on site in compliance with the NPDES permit required by the EPA.

#### *Site Drainage*

Under Alternative A, four stormwater treatment facilities would be located around the project site to take advantage of topography and natural resources to provide optimum site drainage while ensuring impacts to natural resources are minimal. Stormwater facilities are shown on **Figure 2-1** and detailed in the Stormwater/Grading/Erosion Control Requirements Report (Olson Engineering, 2006a) (DEIS Vol. I, **Appendix F**). The four stormwater facilities have been designed to comply with Clark County Code 40.380 (Stormwater and Erosion Control) in accordance with Section 10.0 of the Tribe's MOU with Clark County (DEIS Vol. I, **Appendix C**). Stormwater would be collected from impervious surfaces throughout the development and treated within one of the four stormwater

treatment facilities prior to discharge to either a holding wetland or detention basin. Approximately 75% of the detained stormwater would then be discharged across lateral dissipaters near the northern wetlands, upstream from existing runoff sheet flow of the wetlands to the unnamed creek. The use of lateral dissipaters ensures stormwater energy is dissipated prior to contact with natural resources, thus reducing potential impacts such as soil erosion and increasing water quality such as improved turbidity. Stormwater generated from impervious surfaces on the development site would then traverse through the northern wetlands mixing with existing runoff at the wetlands providing dilution and further treatment before running into the unnamed creek as sheet flow following the natural drainage patterns of the site. The remaining 25% would be directly discharged to the unnamed stream at the same site as the discharge of treated wastewater located west of Storm Facility B (**Figure 2-1**). The stormwater facilities have been situated throughout the project site to ensure stormwater runoff generated from the impervious surfaces associated with the development are contained and treated prior to surface discharge. The following is a brief discussion of each stormwater facility, refer to DEIS Vol. I, **Appendix F** for further details.

#### *Storm Facility A*

Storm Facility A would collect stormwater generated from the Tribal offices, Tribal housing, east half of the RV park, main casino entrance and adjacent road, and the southern half of the casino and hotel roof area. The stormwater would be directed through one of three biofiltration swales before discharging into Wetland Cs, located in the southern portion of the property east of the proposed RV park, which would serve as a natural stormwater detention basin (**Figure 2-1**). Detention volume would be provided by backing up the stormwater over Wetland Cs by the use of natural swales. Overflow stormwater would be piped from the area via pipelines beneath the roads to discharge through a later dissipater prior to reaching Wetland Area Cn in the northeast corner of the project site. An NPDES permit from the EPA would be required for the discharge into Wetland Area Cn (wetland areas are shown in more detail on **Figure 3.5-4**).

#### *Storm Facility B*

Storm Facility B would collect stormwater generated from the western half of the RV park and the western end of NW 319<sup>th</sup> Street (**Figure 2-1**). Stormwater would be directed to a detention pond prior to discharge through a stormwater management filter vault. After passing through the filters within the vault, the filtered stormwater runoff would be discharged directly to the unnamed stream near the wastewater discharge pipe. The discharge to the unnamed stream would require an NPDES permit from the EPA for the point-source discharge. This storm facility would be the only source of direct point-source discharge of stormwater to the unnamed stream.

### *Storm Facility C*

Storm Facility C would collect stormwater generated from the western parking garage (top floor only) and the western half of North Ring Road. Stormwater would be directed through a storm filter vault that discharges through a lateral dissipater to Wetland An. Detention is provided by over-detention within Storm Facilities A and B. The over-detention ensures the required discharge rates are met at the point where the unnamed stream leaves the project site.

### *Storm Facility D*

Storm Facility D would collect stormwater from the northern half of the casino complex, eastern parking garage, and eastern half of North Ring Road. Stormwater would be directed through a biofiltration swale prior to discharging to a detention pond located outside the buffer zones for Wetland Cn, Wetland Bn, and the unnamed stream. From the detention pond, stormwater would be discharged through a lateral dissipater approximately 400 feet south of the unnamed stream.

### *Natural Gas Supply*

Alternative A would use natural gas for a number of purposes including heating, water heating (including swimming pool water), and kitchen operations. Natural gas service would be provided by NW Natural Gas as described in more detail in **Section 3.10**, Public Services.

### *Law Enforcement*

Law enforcement services, prosecution, and court and jail services would be provided by the Clark County Sheriff's Office pursuant to Section 3.0 of the MOU between the Tribe and Clark County (DEIS Vol. I, **Appendix C**) and Section 3(A) and 3(B) of the Tribe's EPHS Ordinance (**Appendix U** of the FEIS) as described in **Section 1.5.1**.

### *Fire Protection*

Fire protection services would be provided by the Clark County Fire Department (CCFD) 12 pursuant to Section 6.0 of the MOU between the Tribe and Clark County (DEIS Vol. I, **Appendix C**) and Section 3(C) of the Tribe's EPHS Ordinance (**Appendix U** of the FEIS) as described in **Section 1.5.2**.

## **2.2.4 TRIBAL FACILITIES**

Alternative A includes Tribal government offices, Tribal elder housing, and a Tribal cultural center. These facilities would be grouped in the southeastern portion of the project site west of I-5 and NW 31<sup>st</sup> Avenue. The elder housing would consist of approximately 16 residences grouped together around a common area and accessed by a loop-road from NW 31<sup>st</sup> Avenue. The proposed elder housing is the Tribe's initial effort at meeting the significant need of Tribal members for housing. Tribal elders are often those most in need of assistance; by locating them near the Tribal government

offices they will be in close proximity to, and therefore, have easy access to, the health and other social services so critical for older members.

The Tribal government offices would consist of 20,000 square feet of office space and the Tribal Council chambers, and would include adequate surface parking for staff and visitors. The Tribal cultural center would be located directly south of the realigned NW 319<sup>th</sup> Street across from the casino porte cochere in order to take advantage of the hotel visitor flow. The cultural center would consist of 12,000 square feet of museum and office space. Sufficient parking would be provided in front of the cultural center.

### **2.3 ALTERNATIVE B – PREFERRED PROJECT WITHOUT REROUTING NW 319<sup>TH</sup> STREET**

Alternative B is similar to Alternative A in most aspects, entailing the placement of the property into trust, issuance of a reservation proclamation, and approval of a gaming management contract. Alternative B also includes the following elements of Alternative A: Tribal elder housing, Tribal government offices, and a cultural center. Operation of the casino-resort, project construction, water supply, wastewater treatment and disposal, and site drainage would be essentially similar to Alternative A. Differences in project components are described below.

Under Alternative B, NW 319<sup>th</sup> Street would not be rerouted, thereby requiring the casino and hotel facilities north of NW 319<sup>th</sup> Street to be placed within the wetlands and wetland buffer areas. The right-of-way for NW 319<sup>th</sup> Street would remain in its current location and the street would continue to provide access to local housing to the west of the site and the casino-resort complex. **Figure 2-6** shows the proposed site plan for Alternative B. The components of Alternative B, which are similar to Alternative A in terms of square footage, capacity, etc., are listed above in **Table 2-1**.

#### **2.3.1 LAND TRUST ACTION AND RESERVATION PROCLAMATION**

This action is similar to that described under Alternative A with the exception that the right-of-way for NW 319<sup>th</sup> Street would remain in its current location. Refer to the land trust action discussion under Alternative A (**Section 2.2.1**) for more detail.

#### **2.3.2 DEVELOPMENT AND MANAGEMENT CONTRACT**

This action is similar to that described under Alternative A. Refer to the management contract approval discussion under Alternative A (**Section 2.2.2**) for more detail.

**Figure 2-6**

### 2.3.3 CASINO-RESORT COMPLEX

The casino-resort complex under Alternative B is similar to what is described under Alternative A with several exceptions as follows:

1. the right-of-way for NW 319<sup>th</sup> Street would remain in its current location as described above;
2. the overall building footprint for the casino-hotel facility would be 878,000 square feet (1,000 square feet larger than Alternative A);
3. there would be two porte cocheres;
4. 100 surface parking spaces would be added adjacent to the casino/hotel (south) porte cochere;
5. the cultural center is not directly accessed from NW 319<sup>th</sup> Street; and
6. the cultural center and the Tribal offices have switched locations relative to NW 31<sup>st</sup> Avenue (i.e. the cultural center is now to the east and the Tribal offices are moved to the west of NW 31<sup>st</sup> Avenue).

#### *ANCILLARY COMPONENTS*

Under Alternative B, the ancillary components related to the RV park, signage, lighting, landscaping, water supply, wastewater treatment, natural gas, law enforcement, and fire protection are similar to those described under Alternative A. Refer to the description of each component under Alternative A (**Section 2.2.3**) for more detail. Below is a discussion of the components that would differ from Alternative A.

#### *Parking*

The parking configuration under Alternative B would be similar to that described under Alternative A with the addition of 100 surface parking spaces (as noted above) for a total of 7,350 spaces. These spaces would be located directly east of the casino/hotel (south) porte cochere.

#### *Site Drainage*

Under Alternative B, five stormwater treatment facilities would be located around the project site to take advantage of topography and building placement to provide optimum site drainage as shown on **Figure 2-6** and detailed in the Stormwater/Grading/Erosion Control Requirements Report (Olson Engineering, 2006a) (DEIS Vol. I, **Appendix F**). Discharge would be via pipelines primarily beneath the roads to the unnamed stream on-site.

Additionally, Wetland Area Cs would be utilized as a natural stormwater detention basin as described under Alternative A above (**Figure 2-1**). Overflow stormwater would be piped from this area via pipelines beneath the roads to discharge near Wetland Area Cn in the northeast corner of the project site. An NPDES permit from the EPA would be required for the discharge into Wetland Area Cn for this alternative also (wetland areas are shown in more detail on **Figure 3.5-4**).

### **2.3.4 TRIBAL FACILITIES**

This component is similar to that described under Alternative A except for building layout within the overall site. Refer to the description of the Tribal headquarters, elder housing, and cultural center under Alternative A (**Section 2.2.4**) for more detail. The layout of these facilities under Alternative B is shown in **Figure 2-6**.

## **2.4 ALTERNATIVE C – REDUCED INTENSITY**

Alternative C, the Reduced Intensity Alternative, consists of development of a reduced size casino-resort complex on the La Center Interchange Site. Alternative C is similar to Alternatives A and B in most aspects, entailing the placement of the property into trust, issuance of a reservation proclamation, and approval of a gaming management contract. Alternative C also includes the following elements of Alternatives A and B: Tribal elder housing, Tribal government offices, and a cultural center. Operation of the casino-resort, project construction, water supply, wastewater treatment and disposal, and site drainage would be essentially similar to Alternatives A and B with some differences as described below.

### **2.4.1 LAND TRUST ACTION AND RESERVATION PROCLAMATION**

This action is similar to that described under Alternative A above. Refer to the land trust action discussion under Alternative A (**Section 2.2.1**) for more detail.

### **2.4.2 DEVELOPMENT AND MANAGEMENT CONTRACT**

This action is similar to that described under Alternative A. Refer to the management contract approval discussion under Alternative A (**Section 2.2.2**) for more detail.

### **2.4.3 CASINO-RESORT COMPLEX**

This alternative entails a reduced intensity casino-resort complex, parking facilities, RV park, wastewater treatment plant, and Tribal facilities. Alternative C would occupy most of the project site. The project plans call for 78,880 square feet of gaming floor (including 2,000 VLTs, 79 gaming tables, and 12 poker tables); 193,765 square feet of restaurant and retail facilities and public space; 125,900 square feet of convention and multi-purpose space (with seating for up to 5,000); a 200-room hotel; and Tribal offices, a Tribal cultural center, and approximately 16 Tribal elder housing units.

Under Alternative C, NW 319<sup>th</sup> Street would not be rerouted. The right-of-way for NW 319<sup>th</sup> Street would remain in its current location and the street would continue to provide access to local housing

to the west of the site as well as to the casino-resort complex. **Figure 2-7** shows the proposed site plan for Alternative C. The components of Alternative C are listed in **Table 2-3**.

**TABLE 2-3**  
ALTERNATIVE C CASINO-HOTEL USE AREAS

Area	Square Footage	Capacity
<b>Casino</b>		
Gaming Floor	78,880	
Dining (8 Outlets)	73,715	
Bars/Entertainment	25,100	
Food and Beverage Support/Kitchen/Pantries	29,500	
Retail	60,000	
Public Space and Restrooms	15,800	
Convention Space	63,400	
Multi-purpose Room	62,500	5,000 seats
Cage/Count Room	7,050	
Casino Support (Back-of-House)	15,375	
Administration Services	74,400	
General Offices	15,828	
Employee Services	30,975	
Building Services	117,675	
Misc. and Circulation	19,150	
<b>Hotel</b>		
Guest Rooms	120,380	200 keys
<b>Parking</b>		
Self-Park Garages (2)		3,800
Valet Parking (subterranean level)		1,500
<b>Total Square Footage</b>	<b>809,728</b>	

NOTE: All figures are approximate.  
Source: Bergman, Walls & Associates, Ltd., 2005.

### **CASINO**

Under Alternative C, the casino facility would be housed in a two-story structure with a subterranean level built into the sloped site as described under Alternative A. The layout of the facility would also be similar to Alternatives A and B in that the main entry level would house the gaming floor and associated public spaces including food and beverage, retail, entertainment, and two porte cocheres. The casino support (back-of-house) facilities would also be on the main floor. The second level would primarily consist of general and administrative offices, while the subterranean level would consist of valet parking, a bus depot, a multi-purpose room and convention facilities, additional general offices, employee services, and additional miscellaneous back-of-house areas.

**Figure 2-7**

### ***HOTEL***

Under Alternative C, the hotel would consist of 200 guest rooms, with a total of 120,380 square feet. The hotel, like the casino, would be of a contemporary nature but would incorporate many of the natural materials of the region including stone and wood. The main hotel entrance would be on the east side, adjacent to the casino/hotel (south) porte cochere.

### ***ANCILLARY COMPONENTS***

Under Alternative C, the ancillary components related to the RV park, signage, lighting, landscaping, natural gas, law enforcement and fire protection are similar to those described under Alternative A. Refer to the description of each component under Alternative A (**Section 2.2.3**) for more detail.

### ***Parking***

Alternative C provides for two self-park garages, each containing 1,900 parking spaces for a total of 3,800 spaces. Employee parking would be contained in these garages. In addition, there will be 1,500 valet parking spaces in the subterranean level for a total of 5,300 spaces.

### ***Water Supply***

The on-site distribution systems for potable and recycled water under Alternative C are similar to the systems described under Alternative A. Refer to the description under Alternative A for more detail. Water demand calculations for Alternative C are discussed in **Section 4.10**, Public Services. As with Alternatives A and B, a 750,000-gallon closed-tank reservoir and booster pump station would be part of the wastewater treatment plant and located on-site to provide adequate supply and pressure for fire flow requirements.

### ***Wastewater Treatment and Disposal***

The wastewater treatment and disposal components of Alternative C are the same as described under Alternative A. Alternative C would utilize gravity lines, a pump station, and an MBR treatment plant with UV light disinfection to collect and treat wastewater for reuse, similar to the system described under Alternative A.

**Table 2-4** shows the estimated average and peak day flows for Alternative C. The components of Alternative A would have an estimated average daily flow of 218,508 gpd (Olson Engineering, 2006b) (DEIS Vol. II, **Appendix G**). Based on this estimate, the daily average design flow is 219,000 gpd, or 152 gpm, with a peak day design flow of 353,000 gpd, or 245 gpm. The peak hourly design wastewater flow is calculated at 532 gpm. The peak day design flow assumes that the facilities are operating at maximum capacity.

**TABLE 2-4**  
DESIGN WASTEWATER FLOWS – ALTERNATIVE C

Criteria	Gallons Per Day (gpd)	Gallons Per Minute (gpm)
Average daily flow	219,000	152
Daily peak flow	353,000	245
Hourly peak flow	--	532

NOTES: Assumes peaking factor of 1.61 times average day flow and 3.5 times average hourly flow.  
Source: Olson Engineering, 2006b.

As described for Alternative A, treated wastewater effluent under Alternative C would be pumped from the treatment plant to the 750,000-gallon closed-tank reservoir for reuse. An NPDES permit from the EPA would be required for discharge of treated wastewater effluent not needed for reuse under this alternative also. The proposed system would be designed to handle the estimated peak flow of 0.22 mgd.

#### *Site Drainage*

Under Alternative C, five stormwater treatment facilities would be located around the project site to take advantage of topography and building placement to provide optimum site drainage as shown on **Figure 2-7** and detailed in the Stormwater/Grading/Erosion Control Requirements Report (Olson Engineering, 2006a) (DEIS Vol. I, **Appendix F**). Discharge would be via pipelines primarily beneath the roads to the unnamed stream on the west side of the site.

Additionally, Wetland Area Cs would be utilized as a natural stormwater detention basin as described under Alternative A above (**Figure 2-1**). Overflow stormwater would be piped from this area via pipelines beneath the roads to discharge into Wetland Area Cn in the northeast corner of the project site. An NPDES permit from the EPA would be required for the discharge into Wetland Area Cn for this alternative also (wetland areas are shown in more detail on **Figure 3.5-4**).

#### **2.4.4 TRIBAL FACILITIES**

Alternative C includes Tribal offices, Tribal elder housing, and a Tribal cultural center similar to those described under Alternative A. Refer to the Tribal facilities discussion under Alternative A (**Section 2.2.4**) for more detail. The layout of these facilities is shown in **Figure 2-7** and is similar in placement to those under Alternative B.

## 2.5 ALTERNATIVE D – BUSINESS PARK

Alternative D is a non-gaming alternative selected based on the location and size of the proposed La Center Interchange Site. Alternative D consists of a business park with proposed uses such as office, industrial flex space and accessory commercial uses. Components of Alternative D are described below.

### 2.5.1 LAND TRUST ACTION AND RESERVATION PROCLAMATION

This action is similar to that described under Alternative A previously. Refer to the land trust action discussion under Alternative A (**Section 2.2.1**) for more detail.

### 2.5.2 BUSINESS PARK

The Business Park Alternative would consist of a technical office park on each side of NW 319<sup>th</sup> Street. This alternative contains one Class A three-story office building consisting of 450,000 square feet that can be leased to a single major tenant or subdivided as required. The majority of the buildings would be single story office/minor warehousing buildings grouped throughout the site. These buildings cumulatively total 960,300 square feet and are designed to have office space in the front portion with potential warehousing space behind. Each unit would have roll-up doors for receiving. A main warehousing type facility would be located in the southwestern portion of the project site. This facility would consist of 168,000 square feet of high density warehousing with 12,500 square feet of office space within the same building. **Figure 2-8** shows the proposed site plan for Alternative D. **Table 2-5** lists Alternative D program components.

**TABLE 2-5**  
ALTERNATIVE D BUSINESS PARK USE AREAS

Area	Square Footage
Class A Office Lease-able Space	450,000
Office Park – Office/Minor Warehousing	960,300
Major Warehouse Building	180,500
<b>Total Square Footage</b>	<b>1,590,800</b>

NOTE: All figures are approximate.

Source: Bergman, Walls & Associates, Ltd., 2005.

### ANCILLARY COMPONENTS

#### *Parking*

Under this alternative, surface parking for 3,742 vehicles would be provided throughout the office park.

**Figure 2-8**

### ***Lighting, and Landscaping***

The exterior lighting under Alternative D would be an integral part of the design and strategically positioned to minimize off-site lighting and any direct site lines to the public. The lighting fixtures would be integrated into components of the architecture to eliminate direct contact from the customer's eyes to the actual light source. While many types of lighting would be used throughout the exterior of the project, the majority would be high pressure sodium, which provides a softer, yellow/golden light. This type of lighting is much less conducive to harsh glare.

The architectural design of the project would be enhanced by the landscaping using plant material native to the region.

### ***Water Supply***

Water supply distribution under Alternative D is similar to that described under Alternative A. Refer to the description under Alternative A for more detail. Water demand calculations for this alternative are discussed in **Section 4.10**, Public Services.

### ***Wastewater Treatment and Disposal***

Wastewater service for Alternative D would be provided by connection to the City of La Center municipal system, as the site is included within the Urban Growth Area (UGA) for the City of La Center. The Tribe would obtain a services agreement with the City of La Center to provide for off-site disposal of wastewater.

### ***Site Drainage***

Three stormwater treatment facilities would be located around the project site to take advantage of topography and building placement to provide optimum site drainage as shown on **Figure 2-8** and detailed in the Stormwater/Grading/Erosion Control Requirements Report (Olson Engineering, 2006a) (DEIS Vol. I, **Appendix F**). Discharge would be via pipelines primarily beneath the roads to the unnamed stream on the west side of the site.

Additionally, Wetland Area Cs would be utilized as a natural stormwater detention basin as described under Alternative A above (**Figure 2-1**). Overflow stormwater would be piped from this area via pipelines beneath the roads to discharge near Wetland Area Cn in the northeast corner of the project site. An NPDES permit from the EPA would be required for the discharge into Wetland Area Cn for this alternative also (wetland areas are shown in more detail on **Figure 3.5-4**).

### *Natural Gas Supply*

Alternative D would use natural gas, principally for space and water heating. Natural gas service to the site would be provided by NW Natural Gas as described in more detail in **Section 3.10**, Public Services.

### *Law Enforcement*

Law enforcement services, prosecution, and court and jail services would be provided pursuant to Section 3.0 of the MOU between the Tribe and Clark County (DEIS Vol. I, **Appendix C**) and Section 3(A) and 3(B) of the Tribe's EPHS Ordinance (**Appendix U** of the FEIS) as described in **Section 1.5.1**.

### *Fire Protection*

Fire protection services would be provided pursuant to Section 4.0 of the MOU between the Tribe and Clark County (DEIS Vol. I, **Appendix C**) and Section 3(C) of the Tribe's EPHS Ordinance (**Appendix U** of the FEIS), as described in **Section 1.5.2**.

## **2.6 ALTERNATIVE E – RIDGEFIELD INTERCHANGE SITE**

Alternative E consists of the development of a casino-resort complex on the Ridgefield Interchange Site, 2 miles south of the La Center Interchange Site identified in Alternative A. Components of Alternative E are described below.

### **2.6.1 LAND TRUST ACTION AND RESERVATION PROCLAMATION**

Alternative E includes the conveyance of 19 parcels totaling approximately 163.02 acres into Federal trust status on behalf of the Tribal Government and issuance of a reservation proclamation. The property to be brought into trust includes those parcels identified in **Table 2-6**. Refer to the land trust action discussion under Alternative A (**Section 2.2.1**) for more detail.

### **2.6.2 DEVELOPMENT AND MANAGEMENT CONTRACT**

This action is similar to that described under Alternative A. Refer to the management contract approval discussion under Alternative A (**Section 2.2.2**) for more detail.

### **2.6.3 CASINO-RESORT COMPLEX**

Alternative E would include a casino-hotel facility, parking facilities, RV park, Tribal government offices, Tribal elder housing, and a Tribal cultural center. The proposed facilities would occupy most of the Ridgefield Interchange Site. The project plans call for 141,275 square feet of gaming floor

(including 3,000 VLTs, 135 gaming tables, and 20 poker tables); 300,225 square feet of restaurant and retail facilities, and public space; 147,500 square feet of convention and multi-purpose space (with seating for up to 5,000); a 300 room hotel; and Tribal government offices, a Tribal cultural center, and approximately 16 Tribal elder housing units. **Figure 2-9** shows the proposed site plan for Alternative E. **Table 2-7** lists the components of the casino-resort complex alongside square footage allocations and seating capacities.

**TABLE 2-6**  
ASSESSOR'S PARCEL NUMBERS – RIDGEFIELD INTERCHANGE SITE

Reference #	APN#	Size (acres)
1	214232-000	4.61
2	214224-000	3.69
3	214199-000	35.24
4	214228-000	10.61
5	214225-000	15.00
6	214196-000	9.29
7	214197-000	12.00
8	214198-000	12.00
9	214233-000	6.00
10	214206-000	20.00
11	214240-000	5.00
12	214241-000	4.64
13	214239-000	5.00
14	214237-000	5.00
15	214238-000	5.00
16	214231-000	4.00
17	214200-000	0.30
18	214202-002	4.68
19	213957-000	0.96
<b>Total</b>		<b>163.02</b>

Source: Clark County, 2005.

### **CASINO**

Under Alternative E, the casino facility would be a two-story structure with a subterranean level built into the sloped site. The architecture would be of a contemporary nature but would incorporate many of the natural materials of the general region including stone and wood. The main entry level would house the gaming floor and associated public spaces including food and beverage, retail, and entertainment. The casino support facilities would also be on the main floor as would the two porte

**Figure 2-9**

cocheres. The second level would primarily consist of general and administrative offices. The subterranean level would consist of valet parking, a bus depot, a multi-purpose room, and convention facilities. The remaining subterranean area would consist of general offices, employee services, and miscellaneous back-of-house areas.

**TABLE 2-7**  
ALTERNATIVE E CASINO-HOTEL USE AREAS

Area	Square Footage	Capacity
<b>Casino</b>		
Gaming Floor	141,275	
Dining (8 Outlets)	85,225	
Bars/Entertainment	35,600	
Food and Beverage Support/Kitchen/Pantries	45,250	
Retail	120,000	
Public Space and Restrooms	19,000	
Convention Space	85,000	
Multi-purpose Room	62,500	5,000 seats
Cage/Count Room	10,050	
Casino Support (Back-of-House)	20,500	
Administration Services	99,200	
General Offices	19,970	
Employee Services	41,300	
Building Services	156,900	
Misc. and Circulation	40,400	
<b>Hotel</b>		
Guest Rooms	180,575	300 keys
<b>Parking</b>		
Self-Park Garages (2)		4,000
Surface Parking Spaces		2,000
Valet Parking (subterranean level)		1,750
<b>Total Square Footage</b>	<b>1,162,745</b>	

NOTE: All figures are approximate.  
Source: Bergman, Walls & Associates, Ltd., 2005.

### ***HOTEL***

Under Alternative E, the hotel would consist of 300 guest rooms, with a total of 180,575 square feet. The hotel, like the casino, would be of a contemporary nature but would incorporate many of the natural materials of the general region including stone and wood. The main hotel entrance would be on the west side, adjacent to the surface parking area.

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## ***ANCILLARY COMPONENTS***

### ***Parking***

Alternative E contains two self-park garages, each containing 2,500 parking spaces for a total of 5,000 spaces. In addition, there will be 1,000 surface parking spaces and 1,750 valet parking spaces in the subterranean level for a total of 7,750 spaces. Employee parking would be provided in the surface lot located between Parking Garage #2 and NE 279<sup>th</sup> Street.

### ***Recreational Vehicle Park***

The RV park would be located in the eastern area of the site, west of the Tribal elder housing and would consist of a large paved parking area with spaces for 200 recreational vehicles. Two laundry facilities would be provided, as well as a clubhouse, one outdoor pool and two spas, play areas, an administrative office, and a dump station for sewer hookup. A security building would be located at the entrance to the campsites adjacent to the clubhouse.

### ***Signage, Lighting, and Landscaping***

The exterior signage would be an integral part of the exterior architectural design. Signs would be compatible with the buildings' architecture as well as the natural characteristics of the site.

The exterior lighting of the project would be an integral part of the design and strategically positioned to minimize off-site lighting and any direct site lines to the public. The lighting fixtures would be integrated into components of the architecture to eliminate direct contact from the customer's eyes to the actual light source. While many types of lighting would be used throughout the exterior of the project, the majority would be high pressure sodium, which provides a softer, yellow/golden light. This type of lighting is much less conducive to harsh glare.

The architectural design of the project would be enhanced by the landscaping using plant material native to the region.

### ***Water Supply***

Alternative E is located within the CPU service area. The Tribe would obtain a Service Agreement letter from CPU to provide service under Alternative E. The Agreement for water supply would be similar in intent and scope to that described in Section 9.3 of the MOU and Section 3(F) of the Tribe's EPHS Ordinance (**Appendix U** of the FEIS) for the preferred site as described under Alternative A.

A 16-inch diameter pipeline runs along the east side of the property and has the capacity and pressure to serve Alternative E, including fire suppression needs. On-site distribution lines would be constructed to connect buildings and fire hydrants to the existing system. No water storage on site is

proposed. Water demand calculations for this alternative are discussed in **Section 4.10**, Public Services.

### ***Wastewater Treatment and Disposal***

Under Alternative E, a sanitary pump station would be located mid-site, south of the wetland area buffer zone and adjacent to an internal roadway. Wastewater would be pumped from the pump station via pipelines beneath the road to a point off site where it would be connected to the municipal system and routed to the City of Ridgefield's water treatment plant. An existing force main to the Ridgefield treatment plant is located ½-mile south of the site and runs along NW 269<sup>th</sup> Street.

The Tribe would obtain a Service Agreement letter from the City of Ridgefield to provide wastewater treatment and disposal service under this alternative.

### ***Site Drainage***

A stormwater treatment facility would be located adjacent to the Tribal elder housing and RV park. Discharge would be via a pipeline that turns east before turning south to run beneath an internal road. The pipeline would discharge stormwater into the central wetland area of the project site. An NPDES permit from the EPA would be obtained for the discharge.

Six additional stormwater treatment facilities would be located around the project site to take advantage of topography and building placement to provide optimum site drainage as shown on **Figure 2-9**. Discharge would be via underground pipelines to the central wetland area.

### ***Natural Gas Supply***

Alternative E would use natural gas for a number of purposes including space and water heating (including swimming pool water), and kitchen operations. Natural gas service to the site would be provided by NW Natural Gas as described in more detail in Section 3.10, **Public Services**.

### ***Law Enforcement***

The Tribe would obtain a Service Agreement letter from Clark County Sheriff's Office to provide law enforcement, prosecution, and court and jail services under Alternative E. The Agreement would be similar in intent and scope to the Agreement established under the MOU and the Tribe's EPHS Ordinance for the preferred site described under Alternative A.

### ***Fire Protection***

The Tribe would obtain a Service Agreement letter from CCFD 12 to provide fire protection services under Alternative E. The Agreement would be similar in intent and scope to the Agreement

established under the MOU and the Tribe's EPHS Ordinance for the preferred site described under Alternative A.

## **2.6.4 TRIBAL FACILITIES**

Alternative E includes Tribal government offices, Tribal elder housing, and a Tribal cultural center. The elder housing would be located in the eastern portion of the site and would consist of approximately 16 residences grouped together around a common area. Access would be via a loop-road. The Tribal offices would consist of 20,000 square feet of office space and would include adequate surface parking for staff and visitors. The Tribal cultural center would consist of 12,000 square feet of museum and office space. Sufficient parking would be provided in the front of the cultural center. Both the Tribal offices and cultural center would be located in the southeastern portion of the site, south of the RV park.

## **2.7 ALTERNATIVE F – NO ACTION**

Under the No Action Alternative, neither the La Center Interchange Site nor the Ridgefield Interchange Site would be placed into Federal trust for the benefit of the Tribe. Neither site would be developed as described under any of the alternatives identified. Land use jurisdiction of the properties would remain with the local jurisdiction. The proposed trust parcels would continue to be vacant. Under this alternative, the BIA would not take any actions in furtherance of their obligation to promote Tribal self-determination and economic development.

## **2.8 COMPARISON OF ALTERNATIVES**

### **2.8.1 SUMMARY OF ALTERNATIVES**

Alternatives A, B, C, and E have the following similar components: (1) the acquisition of land in trust by the BIA; (2) issuance of a reservation proclamation by the Department of the Interior; (3) approval of a gaming development and management contract by the NIGC; and (4) the development of a gaming, entertainment, and hotel complex, associated parking facilities, an RV park, and Tribal facilities (offices, a cultural center, and elder housing). The differences between Alternatives A, B, C, and E are as follows:

- Alternative A, the Preferred Casino-Resort Project, would include the rerouting of NW 319<sup>th</sup> Street through the southern portion of the La Center Interchange Site in order to preserve wetlands on site.

- Alternative B is substantially similar to Alternative A; however, it does not include the rerouting of NW 319<sup>th</sup> Street, thus the wetlands located on the northern portion of the property would be impacted by development.
- Alternative C is the Reduced Intensity Alternative, wherein the size of the gaming and entertainment facility would be approximately 32% smaller than in Alternatives A, B, and E and the hotel would be 20% smaller. The revenue generated by this alternative would be reduced, thereby reducing the number of programs and services the Tribal Government could offer Tribal members and neighboring communities.
- Alternative E includes a casino-resort complex substantially the same as described under Alternatives A and B; however, the alternative project site is located 2 miles south at the Ridgefield Interchange. This location is diagonally bisected by wetlands that can not be entirely avoided by development.

Alternative D is a non-gaming alternative that would replace the proposed casino-resort complex with a business park on the La Center Interchange Site. Under this alternative, land would still be placed into trust by the BIA and a reservation proclamation would be issued by the Department of the Interior. However, as there would be no gaming under this alternative, there would be no approval of a gaming development and management contract by the NIGC. Additionally, there would be no Tribal Headquarters, cultural center, or Tribal elder housing under Alternative D. As part of the business park, Alternative D would include office, industrial flex-space and accessory commercial uses. No on-site wastewater treatment plant is proposed for this Alternative.

Alternative F is the No Action Alternative. Under Alternative F, the land would not be placed into trust, a gaming development and management contract would not be approved, and no development by the Tribe would take place on either the La Center Interchange Site or the Ridgefield Interchange Site.

## 2.8.2 COMPARISON OF ENVIRONMENTAL CONSEQUENCES

As discussed in more detail in **Section 4** of this EIS, the significant environmental consequences of Alternatives A, B, and E include increased employment and economic growth with a resulting increased demand for housing, goods, services, and public services, as well as potential impacts to natural resources like wetlands. Additionally the project would generate significant traffic that may increase air emissions and noise impacts. Significant environmental consequences from Alternative C are similar in type to those of Alternatives A, B, and E but at a reduced scale.

The significant environmental consequences of Alternative D include less employment and economic growth for both the Tribe and neighboring communities than from Alternatives A and B, but greater

trip generation and a higher percentage of trip generation at peak hours with subsequently higher traffic impacts.

The No Action alternative would avoid all environmental effects associated with the implementation of the development alternatives.

## **2.9 OFF-SITE ALTERNATIVES ELIMINATED FROM CONSIDERATION**

The potential field of project alternatives is large. Different locations, sizes of casino and/or hotel, and alternative uses for properties are all potentially of interest. Alternatives, other than the No Action alternative, were first screened to see if they met the purpose and need of the BIA and the Tribe. Remaining alternatives were selected for the EIS largely based on three criteria: 1) providing an adequate range of alternatives, 2) feasibility, and 3) ability to reduce environmental impacts. The intent of the analysis of alternatives in the EIS is to present to decision-makers and the public a manageable number of alternatives that are both feasible and sufficiently different from each other in critical aspects.

As part of this effort the Tribe undertook an extensive search for alternative sites. A total of 19 sites were initially screened using the following criteria:

1. Proximity to the I-5 freeway;
2. Contiguous properties forming 20 acres or more;
3. Contiguous ownership;
4. Availability for purchase;
5. Environmental constraints;
6. Availability of public services; and
7. Underlying zoning designation.

The following properties were further considered after the initial screening:

- A. Koons – (tax lots 181201-000 and 181206-000), adjacent to I-5, east of Fairgrounds exit, 37.7 acres in size, hydric soils and mapped wetlands;
- B. Clark County – (tax lots 182160-000, 182187-000, 182163-000, 182144-000, 182217-000, 182214-000, 182196-000, 182213-000, and 182148-000), just north of NE 134<sup>th</sup> Street/205 Interchange, 170 acres in size, some slopes and wetlands;

- C. Mulford – (tax lots 179373-000, 179378-000, 179366-000, 179365-000, and 179362-000), near the Battle Ground/I-5 junction, 34 acres in size, hydric soils;
- D. Hyde – (tax lots 211007-000 and 210987-000), 80 acres in size, steep slopes and severe erosion hazard; and
- E. Vandersalm – (tax lots 258216-000, 258223-000, 258221-000, 258254-000, 258213-000, 258217-000, 258231-000, 258225-000, and 258224-000), east of I-5, south of the Woodland exit, 157.7 acres in size, within a 100-year floodplain, mapped wetlands, erosion hazard areas.
- F. Red Lion – Quay/Port of Vancouver/Boise Cascade Site (tax lots 049355-00, 049355-001, 048475-000, 502240-000, 048842-000, 048842-000, 502240-000, 049345-000, 049355-001, 502170-000, 502180-000, 50220-000, 502210-000, 502220-000, 502230-000, 58770-000, 58810-000, 58837-001, and 502250-000). This 45-acre site is located adjacent to I-5 just north of the I-5 bridge on the Columbia River. Only part of this site is available for sale with the portion owned by the Port of Vancouver available for lease only, precluding its transfer to trust status and use for gaming. Additionally, the site has several traffic issues including lack of direct access to I-5 and, therefore, would be expected to cause major traffic problems in downtown Vancouver. Accordingly, this alternative was not examined in detail in this EIS.
- G. 503 Riverside Drive – 57 acres situated between Riverside Drive, a narrow local road, State Route (SR) -6 and the Chehalis River. Located west of Interstate 5 (I-5) at Exit 77, the site is not visible from the freeway. On- and off-ramps from I-5 to SR-6 are standard configuration and are signalized at the intersection of I-5, SR-6 and Riverside Drive. Patrons accessing the site from the west along SR-6 must cross a two-lane truss bridge constructed circa 1939 that crosses the Chehalis River. Once on Riverside Drive, all patrons must cross a two-lane concrete bridge, also constructed circa 1939. This bridge crosses an unnamed stream that meanders through the site.

The site is located less than 1 mile from the Chehalis-Centralia Airport (located to the north), the Riverside County Club (a golf course north of the site) and the Veteran's Memorial Museum (located to the east between Riverside Drive and I-5). Directly across the Chehalis River from the site is the Robert E. Lintott Alexander Park originally established in 1905. Two water pump stations are located in the immediate vicinity; the Chehalis River Pump Station at the southwest end of Riverside Drive between the site and the Chehalis River, and the Riverside Pump Station at the northeast end of the site. Water, sewer, and electricity are currently provided as a residential structure is located on the site.

The site itself is located in an area of residential housing (primarily along Riverside Drive and to the east). Environmental Justice impacts may be a concern due to the apparent age and condition of the neighborhood, which boasts both historic-period dwellings and more recent homes, many in need of repair and maintenance. One single-story single-family home was observed on the site and the Lewis County Assessor's Office indicates that there are at least two structures constructed circa 1920 and 1948. It was not apparent during the site visit if the house on the site was the 1948 structure. No other structure was observed. Children's play equipment was located in the yard. Additional information from the Assessor's office indicates that the current use of the site is Agriculture and Single-Unit residential.

The site is classified as supporting Soil Class 2 and is in FEMA Flood Zone A. The County has mapped wetlands on site. Wetlands and the unnamed stream that crosses the site were observed during the site visit.

- H. Henriot Road Site – 158 acres situated between Henriot Road, a narrow local road, I-5, and SR-505. The site, located east of I-5 at Exit 63, is not visible from the freeway. On- and off-ramps from I-5 to SR-505 are standard configuration. Patrons accessing the site must travel on SR-505 for approximately 9/10ths of a mile and cross a two-lane concrete bridge constructed circa 1939. Henriot Road ends in a T-intersection with SR-505 on the south, and with Frost Road on the north.

The site is located adjacent to a Bible Missionary Camp and a Church of the Latter Day Saints. A trailer park, barns, pasture, and rural housing make up the area immediately surrounding the site. Electric lines were observed running along Henriot Road adjacent to the site.

The site itself is characterized by forests and heavy undergrowth. Wetlands were observed during the site visit and the County has mapped wetlands on site. A stream is indicated on the maps (the same stream that the two-lane bridge on SR-505 crosses just before reaching Henriot Road). No structures were observed on the site. The Lewis County Assessor's Office indicates that the current use of the site is Classified Forest/Forest Grade 7. The site is classified as supporting Soil Class 7/Soil Quality C and is in FEMA Flood Zone A and X5.

- I. Grand Prairie Site – 533 acres situated between N Military Road, a narrow local road, I-5, and SR-505. The site, located west of I-5 at Exit 63, may be visible from the freeway in areas if intervening trees were removed. On- and off-ramps from I-5 to SR-505 are standard configuration. Patrons accessing the site must travel on SR-505 for approximately 7/10ths of a mile and pass a Scenic View Point (located at the intersection of I-5 and SR-505). N Military Road ends in a T-intersection with SR-505.

The site is located adjacent to the Winlock Middle/High School. A historic-period dairy farming/residential complex is located in the middle of the site and additional historic-period dwellings were observed elsewhere on site. The Lewis County Assessor's office places the dates of structures at 1898, 1929, and 1930. Electricity, water, and sewer are currently provided to the site as evidenced by the presence of the operating farm and residence. Fiber optic and natural gas lines were observed in the immediate vicinity.

The site itself is currently used for agriculture and cattle grazing. Agricultural irrigation piping was observed running through the property in the vicinity of the dairy. Logging activities appeared to be in progress on the adjacent parcels to the north along McCorkle Road. The County has mapped wetlands on site. The Lewis County Assessor's Office indicates that the current use of the site is Agriculture, Hotel/Motel, Designated Forest, and Classified Forest/Forest Grades 2 and 7. The site is classified as supporting Soil Class 2/Soil Quality B, Soil Class 3, 4, and Soil Class 7/Soil Quality C. The site is in not in a FEMA Flood Zone.

- J. Camus Road Site – 174 acres situated east of I-5 at Exit 63 and spans Camus Road on both the east and west sides, south of SR-505. The site is visible from the freeway. On- and off-ramps from I-5 to SR-505 are standard configuration. Patrons accessing the site would travel on SR-505 for less than 200 yards. Camus Road fronts I-5, but can not be accessed from the highway other than at Exit 63.

The site is located immediately south and adjacent to Gospodor's Monument Park, a private monument/art project located along the east side of I-5 that is highly visible. The Park is neither a historic nor scenic resource, and local opinion varies as to its aesthetic virtue. One house is located at the southeast end of the site along Camus Road just before the entry to Gospodor's Monument Park. No electric/power lines were observed in the vicinity of the site along Camus Road, although they are likely present given the existence of the house described above. Natural gas and fiber optic lines were noted along north side of the site where it abuts SR-505.

The portion of the site east of Camus Road is characterized by forests and heavy undergrowth, and appears as if it is actively being logged. The western portion of the site is open land, and has been mapped by the County as containing extensive wetlands. North of this latter area, between SR-505, I-5, and Camus Road is a paved Park-and-Ride lot. A stream is indicated on the maps as forming, or being close to, the eastern boundary of the site. No structures were observed on the site. The Lewis County Assessor's Office indicates that the current use of the site is Residential and Commercial/Industrial. The Assessor's Office

- did not provide information on Soil Class or Forest Grade. The site is in FEMA Flood Zone A and X5.
- K. No specific property was looked at for analysis in the Exit 60 Area, although the general vicinity was assessed for suitability. The Exit 60 area is located just north of the Cowlitz River on I-5. On- and off-ramps from I-5 are standard configuration. However, there is a State Route (SR-506), frontage roads, and surface streets winding around the immediate area of the exit that make access to particular properties cumbersome. The area is characterized by large open areas, scattered rural housing, and highway-focused commercial establishments. There are several commercial/industrial zoned parcels for sale, some still containing the remains of past development. Electricity, water, and sewer are available in the area to service the existing developments. A review of maps from the Lewis County Assessors office indicates that there are many mapped wetlands and tributary waterways in the vicinity, particularly to the east of I-5. Land immediately adjacent to either side of I-5 is zoned RDD-20, which is bordered east and west by CLB-AgLand. There are no FEMA Flood Zones in RDD-20 areas.

Sites G, H, I, J, and K are all located north of the proposed project area on the I-5 corridor. Many public comments were received which indicated that this area should be investigated and chosen as the location for a Cowlitz resort casino facility. This area was subjected to three different market analyses. One study by EcoNorthwest and one by the Innovations Group, both submitted as comments on the DEIS, and a third study by E.D. Hovee Company commissioned as part of the EIS (**Appendix N** of the FEIS). These studies were utilized by the BIA to determine whether the sites could meet the needs of the Cowlitz Tribal Government as outlined in the Tribal Business Plan (**Appendix E** of the FEIS) submitted as part of the fee-to-trust application under 25 CFR 151. In brief, these alternatives were found to suffer from being inconvenient to both the Seattle and Portland/Vancouver markets, and to not adequately meet the economic objectives and needs of the Tribal government. Additionally, these alternative sites are located in more rural, less developed areas where the potential for adverse impacts would likely be more significant. These alternative sites are not sufficiently distinguishable from those considered that their analysis would offer additional information to assist the BIA in its consideration of impacts under NEPA.

Similarly, other uses for the proposed property were briefly considered but are not presented in this EIS. These uses include a shopping center complex anchored by a “Big Box” store and a technology center. These uses are sufficiently similar to Alternative D that their analysis would offer little additional information.

## **2.10 SELECTION OF ALTERNATIVE A – PREFERRED CASINO-RESORT PROJECT**

Of the alternatives evaluated within this EIS, Alternative A would best meet the purposes and needs of the BIA in promoting the long-term economic vitality and self-governance of the Tribe. The casino-resort complex described under Alternative A would provide the Tribe with the best opportunity for securing a viable means of attracting and maintaining a long-term, sustainable revenue stream. Under such conditions, the Tribal Government would be better prepared establish, fund and maintain governmental programs and offer a wide range of health and welfare services to Tribal members, as well as provide local communities with greater opportunities for employment and economic growth. Alternative A would also allow the Tribe to implement the highest and best use of the property.

Alternative B, while very similar in development to Alternative A, would occur within large areas of wetlands, significantly increasing impacts to the environment and serving to significantly constrain both the scale and effectiveness of potential development. Similarly, Alternative E, located at the Ridgefield Interchange Site would have the same impacts to large areas of wetlands.

Alternative C would also provide economic development opportunities for the Cowlitz Indian Tribe; however, the economic returns would be smaller than under Alternative A and the more limited development is not the most effective use of either the land or the Tribe's capital resources.

The competitive market forces associated with commercial development, the amount of competitive commercial development within the greater Vancouver area, and the location of the project site make Alternative D less attractive than Alternative A from the standpoint of securing a long term, sustainable revenue stream.

Alternative A is the alternative that best meets the purposes and needs of the Tribe while preserving the key natural and cultural resources of the project site. Therefore, Alternative A is the BIA's Preferred Alternative.