

4.10 PUBLIC SERVICES

4.10.1 ALTERNATIVE A – PREFERRED CASINO-RESORT PROJECT

WATER SUPPLY

Alternative A, which includes a casino-resort complex, recreational vehicle (RV) Park, wastewater treatment plant, Tribal elder housing, cultural center, and Tribal offices, would have water supplied by Clark Public Utilities (CPU). Recycled water, consisting of treated effluent from the wastewater treatment plant, would be used for irrigation and other non-potable uses. The Tribe has expressed its intent to contract with CPU for water supply and pay the expenses associated with delivery of service to the La Center Interchange Site; CPU has consented through service agreement letters to enter into negotiations and to contract with the Tribe (FEIS Vol. III, **Appendix BB**).

Table 4.10-1 shows the water demand for Alternatives A and B. The estimated average daily water demand for consumption, food preparation, sanitation, and other general water requirements for the casino and related facilities, including water used in the cooling system, is approximately 475,497 gallons per day (gpd). It is estimated that landscaping would require an additional 20,000 gpd during peak irrigation months. However, irrigation water would be obtained from the recycled water system and would not be an additional demand on the CPU system. There is an additional requirement of 2,500 gpm for 2 hours of emergency fire flow (Olson Engineering, 2006b) (DEIS Vol. II, **Appendix G**). The peak day water demand is estimated at 765,000 gpd and the peak hour demand is estimated at 1,155 gallons per minute (gpm). Based on empirical data from other casinos, peak day and peak hour demands usually occur during holiday weekends.

TABLE 4.10-1
ESTIMATED WATER DEMAND – ALTERNATIVES A AND B

Criteria	Gallons per Day (gpd)	Gallons per Minute (gpm)
Average Daily Water Demand	475,000	330
Peak Day Demand	765,000	531
Peak Hour Demand	--	1,155
Fire Flow	--	2,500

NOTES: Assumes peaking factor of 1.61 times average day flow and 3.5 times average hourly flow.

Source: Olson Engineering, 2006b.

CPU has the supply and pressure capabilities to serve Alternative A (DEIS Vol. II, **Appendix G**) (Olson Engineering, 2006b). CPU water facilities have a pumping capacity of 27 million gallons a day (mgd) and a storage capacity of 17 million gallons. CPU could provide 1,100 gpm for water service and 1,700 gpm for fire service (DEIS Vol. II, **Appendix G**) (Olson Engineering, 2006b).

Recycled water will be available to provide a portion of the water required to supply peak day demands and emergency fire flows. The total on-site storage needed to ensure adequate water supply and fire flows would be 400,658 gallons, supplied by a 750,000-gallon closed-tank reservoir. At peak day demand, Alternative A would use approximately 0.765 mgd from CPU. Peak water demand on the CPU water system is approximately 25 mgd. At peak demand, the Proposed Project would account for 11% of the remaining capacity of the CPU water supply system. CPU's annual water rights include 13,846 acre-feet per year or approximately 4.5 billion gallons (Olson Engineering, 2006b). CPU delivered approximately 3.5 billion gallons in 2005 (CPU, 2005b) and the project would use approximately 173 million gallons annually, which could be accommodated within existing water rights. As CPU facilities are expanded, additional water rights will be obtained (Olson Engineering, 2006b).

These estimates do not include the use of recycled water, which could supply up to 67% of demand, or planned improvements to the CPU system such as an additional three wells, which would increase capacity to an estimated 32 mgd (DEIS Vol. II, **Appendix G**) (Olson Engineering, 2006b).

No significant effects to the water supply distribution facilities would occur as a result of Alternative A. However, in the event of a water shortage or increase in demand on the CPU system that would prevent CPU service from being obtained, potentially significant impacts could occur including the inability to meet water consumption needs and insufficient fire flows in the case of an emergency. Mitigation measures are provided in **Section 5.2.8** to ensure that an adequate water supply is available for the operation of Alternative A, and for the necessary fire flows. With mitigation measures the impact would be less than significant.

WASTEWATER SERVICE

In accordance with the Memorandum of Understanding (MOU) (DEIS Vol. I, **Appendix C**) between the Tribe and Clark County and the Tribe's Environment, Public Health and Safety (EPHS) Ordinance (**Appendix U** of the FEIS), an on-site collection system and treatment plant, constructed to comply with Clark County Code 40.370.010, Sewerage Regulations, would provide wastewater service for Alternative A. The treatment plant and wastewater flows are described in **Section 2.0**, Alternatives, and DEIS Vol. II, **Appendix G** (Olson Engineering, 2006b). The Tribe has committed in Section 9.0 of the MOU and Section 3(F) of the EPHS Ordinance to provide sewage conveyance, treatment, and disposal through development of a new, independent sewage treatment plant, which would meet or exceed Federal and State standards. Additionally, no use of the proposed development would take place on site until sewer service is completed, inspected, and deemed compliant with State and Federal standards. Therefore, no impacts to wastewater public service providers would occur. Alternative options for wastewater treatment are discussed as optional mitigation measures in **Section 5.0**.

SOLID WASTE SERVICE**Construction**

The construction of the casino, hotel, and associated facilities under Alternative A would result in a temporary increase in solid waste generation. Potential solid waste streams from construction are expected to include paper, wood, glass, aluminum and plastics from packing materials; waste lumber; insulation; empty non-hazardous chemical containers; concrete; metal, including steel from welding/cutting operations; and electrical wiring.

Construction waste that cannot be recycled would be collected by Waste Connections, Inc., or a similar company, and disposed of at the Finley Buttes Landfill in Boardman, Oregon, which accepts construction and demolition materials. This impact would be temporary and not significant given that the landfill has an adequate capacity to accommodate the increase in the amount of waste generated by the construction of Alternative A (Rogers, pers. communication, 2005). Mitigation measures are presented in **Section 5.2.8** to further reduce the amount of construction and demolition materials disposed of at the landfill and ensure impacts remain less than significant.

Operation

It is anticipated that the Tribe will contract with Waste Connections, Inc., or a similar company, for solid waste collection service. All waste would be brought to the Central Transfer and Recycling Center, compacted, and then transported by barge to the Finley Buttes Landfill. Based on the generation rates of similar gaming facilities it is estimated that Alternative A would generate approximately 14 tons per day (**Table 4.10-2**). The landfill currently receives 600,000 tons per year and has no permitted cap on the amount of intake it can receive (Large, pers. communication, 2005).

TABLE 4.10-2
ESTIMATED SOLID WASTE DISPOSAL – ALTERNATIVES A AND B

Employment Category	Estimated Number of Jobs	Rate (Tons/employee/year)	Tons per year	Tons per day
Gaming	1,241	0.9	1,116.9	3.06
Hotel	203	2.1	426.3	1.17
Food and Beverage	565	3.1	1,751.5	4.80
Entertainment	56	1.7	95.2	0.26
Gift Shop/Retail	14	1.7	23.8	0.07
Administrative	97	1.7	164.9	0.45
Marketing	153	1.7	260.1	0.71
Human Resources	41	1.7	69.7	0.19
Casino Finance	236	1.7	401.2	1.10
Third-Party Leased	545	1.7	926.5	2.54
Total	3,151		5,236.1	14.35

Source: AES, 2006.

Waste generated under Alternative A would be handled appropriately through disposal at the facilities described above. The landfill could also accept biosolids from the project, which are anticipated to be 2-3 cubic yards per week (Large, pers. communication, 2006). Landscaping and maintenance staff would pick up any trash that is left on the property. Decorative receptacles for trash and recycling would be placed strategically throughout the casino, hotel, and associated facilities to discourage littering. A compactor would be used to reduce the volume of trash prior to transportation off site. The solid waste from Alternative A would represent approximately 5,236 tons per year or 0.9% of the Finley Buttes Landfill's intake. Alternative A would not result in a significant amount of solid waste being transported to the landfill. Mitigation measures are presented in **Section 5.2.8** to further reduce the amount of solid waste disposed of at the landfill and ensure impacts remain less than significant.

ELECTRICITY, NATURAL GAS, AND TELECOMMUNICATIONS

Construction

Construction on site could damage underground utilities, leading to outages and/or serious injury. This impact is potentially significant. Mitigation measures are presented in **Section 5.2.8** to reduce impacts to less than significant.

Operation

The total electrical usage for Alternative A would be approximately 27,631 kilowatts (kW), with a 10% contingency (Roche, pers. communication, 2005). CPU is the nearest electrical provider to the La Center Interchange Site and currently operates 45 to 50 substations throughout the area. CPU has indicated that it has extra generation capacity available for the Proposed Project (Morris, pers. communication, 2005a). However, to serve Alternative A adequately, a new substation would be needed near the site as well as new transmission and feeder lines (Morris, pers. communication, 2005a). The new feeder line would connect Alternative A facilities to the new substation, which would in turn connect to the existing CPU system by constructing approximately 5 to 6 miles of transmission lines. Emergency back-up generators would be provided under Alternative A. The Tribe and CPU have expressed their intent to enter into negotiations to provide electrical service to the property (DEIS Vol. III, **Appendix BB**). While negotiations are not complete, it is expected that for service, CPU would charge the Tribe based on the percentage of load used from the new substation, while costs of construction of the new transmission line and substation would be borne by CPU. Because current CPU infrastructure does not have enough capacity to accommodate the estimated increase in usage under Alternative A, effects to electricity are considered significant. Mitigation measures are provided in **Section 5.2.8**, which, in connection with the proposed CPU upgrades, would reduce effects to less than significant.

There is the potential for excessive electrical usage and inefficiencies at the casino due to air leaks, heating and cooling waste, and inefficient lighting, appliances, and electrical equipment. While this is not expected to be a significant impact, **Section 5.2.8** presents mitigation measures and management practices related to energy conservation to ensure impacts remain less than significant. Additionally, the Tribe has committed in the MOU with Clark County and EPHS Ordinance (**Appendix U** of FEIS) to develop the property consistent with Clark County Codes (CCC) Chapter 14.28A, Clark County Energy Code and Chapter 14.04, Building Code (DEIS Vol. I, **Appendix C**). These measures would increase the electrical and economic efficiency of the Proposed Project, ensuring that impacts remain less than significant.

Alternative A would utilize natural gas from NW Natural. Alternative A would require the construction of approximately 6,000 feet of 6-inch diameter gas line to connect to an existing 4 inch diameter line running along NW 299th Street. NW Natural is currently planning on extending service to the vicinity of the La Center Interchange Site due to projected commercial and industrial demands in the area. The new main would be located west of the La Center Interchange Site on NW 41st Avenue (refer to **Figure 3.10-1**). The cost to the applicant of extending service is based on a cost benefit analysis of the improvement. If the cost to extend to the property is less than the benefit over 5 years then there is no charge to the applicant for extension. Therefore, it is likely that based on the amount of use by Alternative A, there would be no cost for the extension (Walstra, pers. communication, 2006). As natural gas service is planned in this area the impact is considered less than significant.

Qwest currently provides telephone service to the La Center Interchange Site. Comcast provides cable services. The Tribe would utilize these or similar services. Qwest and Comcast have the technical capacity to supply Alternative A with adequate telecommunication services. Therefore, development of telephone and cable services on the site is not expected to be a significant impact as the Tribe intends to provide their portion of the necessary funding for the installation and operation of services. No significant effects to local service would occur.

PUBLIC HEALTH AND SAFETY

The Tribe has agreed in Section 7.0 of the MOU (DEIS Vol. I, **Appendix C**) and Section 3(D) of the EPHS Ordinance to follow all health regulations adopted by the State of Washington and Clark County. The Tribe also agreed to obtain all required permits and to allow health inspectors access to the property to ensure compliance with all State and local health regulations. In Section 10.0 of the MOU and Section 3(G) of the EPHS Ordinance, the Tribe has committed to consistency with those County codes applicable to construction that are attached as Exhibit C to the MOU. Impacts to public health and safety would be less than significant.

Law Enforcement

National studies have researched the link between gambling and crime in communities across the United States. The National Gambling Impact Study Commission (NGISC) was created by Congress to, among other tasks, assess the relationship between gambling and levels of crime. The Final Report from the NGISC, states, “insufficient data exists to quantify or define that relationship” (NGISC, 1999). A separate study by the National Opinion Research Center (NORC), commissioned by the NGISC, analyzed Federal Bureau of Investigation (FBI) crime data from 100 communities with varying degrees of proximity to casino gambling. The study concluded that the availability of casino gambling had no effect on rates of serious violent or property crimes like larceny, murder, burglary, motor vehicle theft, assault, or robberies (NGISC, 1999). The National Public Sector Gaming Study Commission (NPSGSC) concluded that (NPSGSC, 2000):

...the majority of the information collected during the past decade indicates that there is no link between gambling, particularly casino-style gambling, and crime. The security on the premises of gambling facilities, the multiple layers of regulatory control, and the economic and social benefits that gambling seems to offer to communities are effective deterrents of criminal activity.

Data from these national studies suggest that there would not be a significant increase in criminal activity from the opening of a casino.

In addition to the national studies, the following six California communities were surveyed that have had Indian casinos within close proximity to or within their jurisdiction for at least the past two years:

- Thunder Valley Casino in Lincoln, Placer County;
- Chumash Casino Resort in Santa Ynez, Santa Barbara County;
- Pala Casino Resort and Spa, in Pala, San Diego County;
- Spa Resort Casino in Palm Springs, Riverside County;
- Barona Valley Ranch Resort and Casino in Lakeside, San Diego County; and
- Cache Creek Casino Resort in Brooks, Yolo County.

Each of these casinos offers slot machines, gaming tables and hotel accommodations with the exception of Thunder Valley Casino (no hotel accommodations). **Table 4.10-3** summarizes the year in which each casino opened, square footage of the casino, number of slot machines, number of gaming tables, number of hotel rooms and the city population. All of the casinos opened in 2003 except Pala Casino Resort and Spa, which opened in 2001. Each casino offers an average of 2,000 slot machines, an average of 70 gaming tables, and with the exception of Thunder Valley and Chumash, an average of approximately 300 hotel rooms (BAE, 2005).

**TABLE 4.10-3
COMPARATIVE CASINOS**

Facility	Location	Year Opened	Casino Square Footage	No. of Slot Machines	No. of Hotel Rooms	Local Population (2000)
California						
Thunder Valley Casino	Lincoln, Placer County, CA	2003	200,000	2,700	0	13,900
Chumash Casino Resort	Santa Ynez, Santa Barbara County, CA	2003 (casino) 2004 (hotel)	94,000	2,000	106	4,584
Pala Casino Resort and Spa	Pala, San Diego County, CA	2001	185,000	2,250	507	133,559
Spa Resort Casino	Palm Springs, Riverside County, CA	2003	45,000	1,000	228	42,807
Barona Valley Ranch Resort and Casino	Lakeside, San Diego County, CA	2003	310,000	2,000	397	19,560
Cache Creek	Brooks, Yolo County, CA	2002 (casino expansion)	313,000	1,762	300	21,300
Oregon and Washington						
Chinook Winds	Lincoln City, OR	1995	157,000	1,250	227	7,437
Kah-Nee-Ta High Desert Resort & Casino	Jefferson County, OR	2001	25,000	338	139	19,009
Lucky Eagle	Rochester, WA	1995	50,000	585	69	1,829
Spirit Mountain	Grand Ronde, OR	1995	90,000	1,500	254	271
La Center Card Rooms	La Center, WA	1986-1990	Varies	N/A	0	1,654

Source: AES, 2006; BAE, 2005; E.D. Hovee, 2006d.

Local law enforcement offices were contacted to inquire about the impacts of the casinos and whether the facilities induced a higher incidence of crime. Each local law enforcement agency contacted reported an increase in law enforcement service demand as a direct result of the opening of a casino within its jurisdiction. All reported the typical crimes and/or calls for service that have increased include driving under the influence, personal robbery, credit card fraud, auto thefts, disorderly conduct, and assault. Although instances of these crimes have increased in all of the casino communities, no department could implicate the casino as the direct cause of the increase in crime. Rather, each department expressed that the increased concentration of people within the local area led to the increase in crime.

In addition to the interviews with local law enforcement officials, uniform crime reporting statistics were also compiled for the different host communities and published by the State Attorney General's

Office (FBI, 2004). Crime data for the local jurisdiction as well as the overall county in which each is located were collected. Per capita crime rates were calculated by combining this information with population figures for each area. These data show that crime rates in Lincoln, the community nearest the Thunder Valley Casino, are very similar to the rates in Placer County overall. Crime rates in unincorporated Santa Barbara County, where the Chumash Casino Resort is located, are slightly below the County average. Crime rates in Palm Springs, where the Spa Resort and Casino is located, are higher than in Riverside County overall. Crime rates in unincorporated San Diego County, where the Barona Valley Ranch Resort and Spa and the Pala Casino Resort and Spa are located, are significantly below the crime rates in the County overall. With three local jurisdictions experiencing lower crime rates, one experiencing comparable crime rates, and one jurisdiction experiencing greater crime rates, these data do not show a definitive link between crime rates and the presence of a casino.

A post-development review of regional gaming facilities was conducted by E.D. Hovee and is included as **Appendix M** of the FEIS. Facility information for the surveyed establishments in Oregon and Washington are provided in **Table 4.10-3**. Law enforcement officials were interviewed regarding impacts from the opening of gaming establishments within their jurisdiction. While there are specific issues cited in several of the communities, law enforcement has been less of an issue than was anticipated in advance of opening gaming facilities. Items noted by different communities include expansion of police service hours, tribal member gambling, social service effects, drunk driving and credit card fraud – but with no single common issue affecting multiple communities. Added law enforcement has eliminated any real or perceived financial issues related to law enforcement.

As with other entertainment venues, Alternative A would increase demands on law enforcement through increased population at the La Center Interchange Site. The number of calls for service from casinos varies widely based on community crime rates, patronage, distance from an urban center, presence of tribal security, etc. The number of calls for service in 2003 were available for Chumash Casino and Pala Casino Resort and Spa. Chumash Casino had 204 calls for service while Pala Casino Resort and Spa had 181 calls for service in 2003 (BAE, 2005). Cache Creek reported approximately 600 to 650 calls for service between 2002 and 2004 (Yolo County Sheriff, 2004). Thunder Valley reported 1,057 calls for service between August 2003 and August 2004 (Placer County Sheriff, 2004). Not all calls for service resulted in an arrest. Based on the wide range given for these facilities, it is estimated that Alternative A would result in between 200 to 1,000 calls for service per year. Increased calls for service would result in increased crime reports; currently, the Clark County Sheriff's Office experiences a 4:1 ratio of calls to crime reports (Lucas, 2005). Thus the calls for service would result in between 50-200 crime reports filed per year. To address the potential of an increased need for police, prosecution, and court and jail services resulting from the development of Alternative A, the Tribe has committed to reimburse Clark County pursuant to Section 3.0 of the MOU (DEIS Vol. I, **Appendix C**) and Section 3(A) and 3(B) of the EPHS Ordinance (**Appendix U**

of FEIS). In accordance with the MOU/EPHS Ordinance, the Tribe would enter into an agreement to reimburse the Clark County Sheriff's Office for reasonable direct and indirect costs incurred in conjunction with providing law enforcement services. Special events would require a separate agreement. If a Tribal security force were created, Clark County would assist the Tribe with the training of personnel as part of a security force. The Sheriff's Office and the Tribal security force would then routinely work together on criminal matters that occur on the trust property. The Tribe would enter into an agreement with Clark County to provide reimbursement for court and jail services, similar to Exhibit B of the MOU (DEIS Vol. I, **Appendix C**) and Section 3(B) of the EPHS Ordinance (**Appendix U** of FEIS), unless these services were otherwise paid for through an impact mitigation fund given directly to the County. Court and jail services would be charged on a per case basis with additional costs for special services like health care, parole, etc. Without funding, impacts to the Sheriff's Office and County court and jail services would likely strain or exceed existing resources. However, impacts to law enforcement would be mitigated through the Clark County MOU and a contractual agreement with the Clark County Sheriff's Office (Lucas, 2005), thereby reducing the impacts to less than significant. Mitigation measures to further ensure that impacts remain less than significant are identified in **Section 5.2.8**.

Criminal Jurisdiction

In 1963, Washington State assumed partial jurisdiction over certain offenses occurring in Indian country pursuant to Public Law 83-280 (PL 280) (See Wash. Rev. Code Sections 37.12.010-.070 [1964]). As a consequence, the trust acquisition and reservation proclamation would result in changes in criminal jurisdiction on the La Center Interchange Site dependent on whether victims or the accused are Indian. However, it is expected that a great majority of future criminal matters resulting from the development of Alternative A would consist of crimes committed on the reservation by non-Indians against other non-Indians. In these cases the State of Washington would continue to exercise criminal jurisdiction. The MOU between the Tribe and Clark County (DEIS Vol. I, **Appendix C**) and the Tribe's EPHS Ordinance (**Appendix U** of FEIS) make provisions to assist in both enforcement and prosecution in these cases. Accordingly, changes in criminal jurisdiction would not be significant.

Fire Protection and Emergency Medical Services

Construction Effects

Construction may introduce potential sources of fire to the La Center Interchange Site. During construction, equipment and vehicles may accidentally spark and ignite vegetation. Equipment used during grading and construction activities may also create sparks which could ignite dry grass on the site. This risk, which is similar to those that are found at other construction sites, is considered significant. Mitigation measures are presented in **Section 5.2.8** to address this potential impact and reduce impacts to less than significant.

Operation Effects

Development of commercial facilities on the property would create additional risks from fires and add to firefighting responsibilities in the area. Vegetation in and around the developed areas would be irrigated, thereby minimizing the risk of fire. Additionally, the timely detection of fires by individuals working in the casino, hotel, and associated facilities, early intervention, and firebreaks created by driveways and roads would reduce the size and duration of fires. The casino, hotel, and associated facilities would be fitted with automatic fire sprinkler systems. The facilities would be constructed to meet adequate fire flow requirements as discussed under Water Supply above. The 750,000-gallon on-site closed-tank water reservoir would provide water for fire suppression and provide the required flow of 2,500 gpm for 2 hours.

Alternative A would increase the number of visitors in the area, which would result in the need for increased fire protection and emergency medical services. The Tribe has committed, in Section 6.0 of the MOU (DEIS Vol. I, **Appendix C**) and Section 3(C) of the EPHS Ordinance (**Appendix U** of FEIS), to reimburse Clark County Fire District (CCFD) 12 for costs relating to the provision of fire and emergency medical services. In accordance with the MOU/EPHS Ordinance, the Tribe will enter into an agreement to reimburse CCFD 12, taking into account payments received by the District directly or indirectly through any impact mitigation fund given directly to Clark County. Impacts related to response times for emergency services due to traffic impacts are discussed in **Section 4.8**.

CCFD 12 currently has a public/private contract for ambulance service through American Medical Response (AMR). If the Tribe made an agreement with CCFD 12 for emergency and fire protection services, ambulance service would be provided through this contract (Smith-Lee, pers. communication, 2005). AMR would be responsible for maintaining a response time standard of 11.59 minutes, 90% of the time. Clark Regional Emergency Services Agency (CRESA) provides emergency management and dispatch services. It is not anticipated that the development would significantly increase the number of dispatched calls to a level that would require additional resources or staff.

The nearest emergency room is located at the Legacy Salmon Creek Hospital in northern Vancouver. The Southwest Washington Medical Center in southern Vancouver is the next closest emergency room. On average, Southwest Washington Medical Center has extra bed capacity and the new Legacy Salmon Creek Hospital adds additional capacity to the Clark County area. Because emergency medical services are adequate to serve Alternative A, the effects to emergency services would be less than significant.

Based on the obligations assumed by the Tribe under the MOU/EPHS Ordinance, as well as the capacity of existing emergency medical services, the impacts on fire and emergency services would

be less than significant. Mitigation measures to ensure impacts to fire and emergency services remain less than significant are identified in **Section 5.2.8**.

4.10.2 ALTERNATIVE B – PREFERRED PROJECT WITHOUT REROUTING NW 319TH STREET

WATER SUPPLY

The components of Alternative B are similar to those of Alternative A with the exception that Alternative B would not include rerouting of NW 319th Street. As the facilities are of the same size and use, the water demand for Alternative B is the same as that anticipated for Alternative A. **Table 4.10-1** above shows the water demand for Alternatives A and B. The peak day design demand is estimated at 475,000 gpd and the peak hour design demand is estimated at 1,155 gpm. There is an emergency fire flow requirement of 2,500 gpm for 2 hours.

As indicated under Alternative A, CPU has the supply and pressure capabilities to serve the Proposed Project. CPU water facilities have a pumping capacity of 27 mgd and a storage capacity of 17 million gallons. CPU could provide 1,100 gpm for water service and 1,700 gpm for fire service. The total on-site storage needed to ensure adequate water supply and fire flows would be 400,658 gallons, supplied by a 750,000-gallon closed-tank reservoir. Similar to Alternative A, Alternative B at peak day demand is estimated to use 765,000 gpd from CPU. This represents 2.8% of CPU's pumping capacity (Olson Engineering, 2006b). On average Alternative B would use 475,000 gpm or 1.8% of CPU's pumping capacity (Olson Engineering, 2006b). These estimates do not include planned improvements to the CPU system or the use of recycled water. Recycled water will be available to supply peak day demands and emergency fire flows reducing the amount of water needed from CPU by up to 67%.

No significant effects to the water supply distribution facilities would occur as a result of Alternative B. However, in the event of a water shortage or increases in demand that would prevent CPU service from being obtained, potentially significant impacts could occur including the inability to meet water consumption needs and insufficient fire flows in the case of an emergency. Mitigation measures are provided in **Section 5.2.8** to ensure that an adequate water supply is available for the operation of Alternative B, and for the necessary fire flows. With mitigation measures the impact would be less than significant.

WASTEWATER SERVICE

In accordance with Clark County Code 40.370.010, Sewerage Regulations, as specified in the MOU/EPHS Ordinance, wastewater service for Alternative B would be provided by an on-site wastewater treatment plant as described in **Section 2.0**, Alternatives and discussed under Alternative A above. The same MOU/EPHS Ordinance provisions as discussed under Alternative A would apply. Because the Tribe would utilize an on-site independent wastewater system, no impacts to

wastewater public service providers would occur. Alternative options for wastewater treatment are discussed as optional mitigation measures in **Section 5.0**.

SOLID WASTE SERVICE

Construction

The construction of Alternative B would result in a temporary increase in solid waste generation similar in composition and volume to that described under Alternative A. Potential solid waste streams from construction are expected to include paper, wood, glass, aluminum and plastics from packing materials; waste lumber; insulation; empty non-hazardous chemical containers; concrete; metal, including steel from welding/cutting operations; and electrical wiring. Waste that cannot be recycled would be disposed of at the Finley Buttes Landfill in Boardman, Oregon, which accepts construction and demolition materials. This impact would be temporary and not significant given that the landfill has an adequate capacity to accommodate the increase in the amount of waste generated by the construction of Alternative B (Rogers, pers. communication, 2005). Mitigation measures are presented in **Section 5.2.8** to further reduce the amount of construction and demolition materials disposed of at the landfill and ensure impacts remain less than significant.

Operation

It is anticipated that the Tribe will contract with Waste Connections, Inc., or a similar company, for solid waste collection service. All waste would be brought to the Central Transfer and Recycling Center, compacted, and then transported by barge to the Finley Buttes Landfill. As the facilities of Alternative A and B are similar in size and use, it is estimated that Alternative B would generate the same amount of solid waste as Alternative A, or 14 tons per day (**Table 4.10-2**). The solid waste from Alternative B would represent approximately 5,236 tons per year or 0.9% of the Finley Buttes Landfill's intake. Biosolids could also be accepted at the landfill as discussed for Alternative A. Alternative B would not result in a significant amount of solid waste being transported to the landfill. Methods of trash reduction are similar to those described under Alternative A, and mitigation measures to further reduce impacts from solid waste generation and ensure they remain less than significant are described in **Section 5.2.8**.

ELECTRICITY, NATURAL GAS, AND TELECOMMUNICATIONS

Construction

Construction on site could damage underground utilities, leading to outages and/or serious injury. This impact is potentially significant. Mitigation measures are presented in **Section 5.2.8** to reduce impacts to less than significant.

Operation

As Alternatives A and B are similar in size and type of facilities, it is estimated that Alternative B would have the same electrical usage (approximately 27,631 kW with 10% contingency) as Alternative A. The same improvements would also be needed as those listed for Alternative A, including a new substation near the site, as well as new feeder and transmission lines. CPU and the Tribe have expressed their intent to enter into negotiations for electrical service (DEIS Vol. III, **Appendix BB**). While negotiations are not complete, it is expected that for service, CPU would charge the Tribe based on the percentage of load used from the new substation while costs of construction of the new transmission line and substation would be borne by CPU. Because current infrastructure does not have enough capacity to accommodate the usage increase, effects to electricity are considered significant. Mitigation measures are provided in **Section 5.2.8**, which, in connection with the proposed CPU upgrades, would reduce impacts to less than significant.

There is the potential for excessive electrical usage at the casino due to air leaks, heating and cooling waste, and inefficient lighting, appliances, and electrical equipment. While this is not expected to be a significant impact, **Section 5.2.8** presents mitigation measures and management practices related to energy conservation to ensure impacts remain less than significant. Additionally, the Tribe has committed in the MOU with Clark County and EPHS Ordinance to develop the property consistent with CCC Chapter 14.28A, Clark County Energy Code and Chapter 14.04, Building Code (DEIS Vol. I, **Appendix C**). These measures would increase the electrical and economic efficiency of the Proposed Project, ensuring that impacts remain less than significant.

As with Alternative A, Alternative B would utilize natural gas from NW Natural. The cost to the applicant of extending service from the nearest existing main (approximately 1 mile south) is based on a cost benefit analysis of the improvement. NW Natural has identified that it is likely that there would be no cost to the applicant for extension of service for Alternative A, which is similar in size and uses to Alternative B (Walstra, pers. communication, 2006). NW Natural is currently planning on extending service to the vicinity of the La Center Interchange Site due to projected commercial and industrial demands in the area. As natural gas service is planned in this area the impact is considered less than significant. No mitigation is necessary.

Qwest currently provides telephone service to the La Center Interchange Site. Comcast provides cable services. The Tribe would utilize these or similar services. Qwest and Comcast have the technical capacity to supply Alternative B with adequate telecommunication services. Therefore, development of telephone and cable services on the site is not expected to be a significant impact as the Tribe intends to provide their portion of the necessary funding for the installation and operation of services. No significant effects to local service would occur.

PUBLIC HEALTH AND SAFETY

Refer to the discussion under Alternative A for public health and safety issues agreed to in the MOU/EPHS Ordinance.

Law Enforcement

National studies have not found a statistically significant connection between casino gambling and crime as discussed under Alternative A. As with Alternative A, Alternative B could cause increased demands on law enforcement, prosecution, and court and jail services due to the presence of increased numbers of patrons at the La Center Interchange Site. Based on the existing wide range of calls for service, Alternative B is estimated to result in between 200 to 1,000 calls for service per year resulting in between 50 to 200 crime reports per year. The Tribe has committed to reimburse Clark County for these services in Section 3.0 of the MOU and Section 3(A) and (B) of the EPHS Ordinance. Commitments in the MOU/EPHS Ordinance and issues of change in criminal jurisdiction are also discussed under Alternative A and in **Section 2.0**, Alternatives and **Section 3.10**, Public Services. Without funding, impacts to the Sheriff's Office and County court and jail services would likely strain or exceed existing resources. However, impacts to law enforcement would be mitigated through the Clark County MOU and a contractual agreement with the Clark County Sheriff's Office (Lucas, 2005), thereby reducing the impacts to less than significant. Mitigation measures to ensure impacts to law enforcement services remain less than significant are identified in **Section 5.2.8**.

Fire Protection and Emergency Medical Services

Construction and operation on the La Center Interchange Site would create risks from fires; these risks and precautions to reduce the risk of fire are similar to those discussed under Alternative A. As with Alternative A, fire suppression components on site would include fire sprinkler systems, fire hydrants, and a closed-tank water reservoir to provide water at the required fire flow of 2,500 gpm for 2 hours. To address the potential of an increased need for fire protection and emergency medical services resulting from the development of Alternative B, the Tribe has committed, in Section 6.0 of the MOU and Section 3(C) of the EPHS Ordinance, to reimburse CCFD 12 for costs related to the provision of such services. Specific details on provisions of the MOU/EPHS Ordinance are discussed under Alternative A. Impacts related to response times for emergency services due to traffic impacts are discussed in **Section 4.8**. Emergency medical services would be provided by AMR and Legacy Salmon Creek Hospital. Impacts to emergency services are similar to those discussed under Alternative A. Based on the obligations assumed by the Tribe under the MOU/EPHS Ordinance, as well as the capacity of existing emergency medical services, the impacts on fire and emergency services would be less than significant. Mitigation measures to ensure impacts to fire and emergency services remain less than significant are identified in **Section 5.2.8**.

4.10.3 ALTERNATIVE C – REDUCED INTENSITY

WATER SUPPLY

The components of Alternative C are similar to those of Alternative A, but the casino-resort complex facility is reduced in size, and this alternative does not include rerouting NW 319th Street. Alternative C, as with Alternative A, would have water supplied by CPU. Recycled water, consisting of treated effluent from the wastewater treatment plant, would be used for irrigation and other non-potable uses to reduce the demand on CPU water supplies. Also under this Alternative, as with Alternative A, the Tribe has expressed its intent to contract with CPU for water supply and pay the expenses associated with delivery of service to the La Center Interchange Site; CPU has consented through service agreement letters to enter into negotiations and to contract with the Tribe (DEIS Vol. III, **Appendix BB**).

On average, water use for Alternative C is estimated at 347,808 gpd or 1.3% of CPU's pumping capacity (Olson Engineering, 2006b). The peak day water demand for Alternative C is estimated at 389 gpm or 560,000 gpd (Olson Engineering, 2006b). This represents 2.1% of CPU's pumping capacity. These estimates do not include planned improvements to the CPU system or the use of recycled water. There is an additional emergency fire flow requirement of 2,500 gpm for 2 hours. The total on-site storage needed to ensure adequate water supply and fire flows would be 400,658 gallons, the same as the amount needed to supply Alternative A. This would be supplied by a 750,000-gallon closed-tank reservoir. CPU has the supply and pressure capabilities to serve the reduced intensity development associated with Alternative C.

No significant effects to public water supply facilities would occur as a result of Alternative C. However, in the event of a water shortage or increase in demand on the CPU system that would prevent CPU service from being obtained, potentially significant impacts could occur including the inability to meet water consumption needs and insufficient fire flows in the case of an emergency. Mitigation measures are provided in **Section 5.2.8** to ensure that an adequate water supply is available for the operation of Alternative C, and for the necessary fire flows. With mitigation measures the impact would be less than significant.

WASTEWATER SERVICE

In accordance with the MOU (DEIS Vol. I, **Appendix C**) between the Tribe and Clark County and Section 3(F) of the EPHS Ordinance (**Appendix U** of FEIS), an on-site collection system and treatment plant, constructed to comply with Clark County Code 40.370.010, Sewerage Regulations, would provide wastewater service for Alternative C as described in **Section 2.0**, Alternatives and discussed under Alternative A above. The same MOU/EPHS Ordinance provisions as discussed under Alternative A would apply. Because the Tribe would utilize an on-site independent wastewater

system, no impacts to wastewater public service providers would occur. Alternative options for wastewater treatment are discussed as optional mitigation measures in **Section 5.0**.

SOLID WASTE SERVICE

Construction

The construction of Alternative C would result in a temporary increase in solid waste generation similar in composition but slightly reduced in volume to Alternative A. Waste that cannot be recycled would be disposed of at the Finley Buttes Landfill in Boardman, Oregon, which accepts construction and demolition materials. This impact would be temporary and not significant given that the landfill has an adequate capacity to accommodate the increase in the amount of waste generated by the construction of Alternative C (Rogers, pers. communication, 2005). Mitigation measures are presented in **Section 5.2.8** to further reduce the amount of construction and demolition materials disposed of at the landfill and ensure impacts remain less than significant.

Operation

It is anticipated that the Tribe will contract with Waste Connections, Inc., or a similar company, for solid waste collection service. All waste would be brought to the Central Transfer and Recycling Center, compacted, and then transported by barge to the Finley Buttes Landfill. Based on the analysis for Alternative A, there is an average generation rate of 1.8 tons of solid waste per employee per year. Alternative C would employ approximately 2,156 employees (E.D. Hovee, 2006a) and represent approximately 3,881 tons per year or 0.6% of the Finley Buttes Landfill's intake. Biosolids could also be accepted at the landfill as discussed for Alternative A. Therefore, Alternative C would not result in a significant amount of solid waste being transported to the landfill. To reduce the volume of trash even further, a compactor would be used. Methods of trash reduction are similar to those described under Alternative A and mitigation measures are provided in **Section 5.2.8** to ensure impacts from solid waste remain less than significant.

ELECTRICITY, NATURAL GAS, AND TELECOMMUNICATIONS

Construction

Construction on site could damage underground utilities, leading to outages and/or serious injury. This impact is potentially significant. Mitigation measures are presented in **Section 5.2.8** to reduce impacts to less than significant.

Operation

The estimated electrical load for Alternative A is 27,631 kW with a 10% contingency (Roche, pers. communication, 2005), and the components of Alternative C have identical uses yet are smaller in size when compared to Alternative A; therefore, it is reasonable to assume that the electrical load would be similar but not greater than that of Alternative A. CPU has indicated that it has extra

generation capacity to provide service to Alternative C (Morris, pers. communication, 2005a). The same improvements would be needed as those listed for Alternative A, including a new substation near the site, as well as new feeder and transmission lines. CPU and the Tribe have expressed their intent to enter into negotiations for electrical service (DEIS Vol. III, **Appendix BB**). While negotiations are not complete, it is expected that for service, CPU would charge the Tribe based on the percentage of load used from the new substation while costs of construction of the new transmission line and substation would be borne by CPU. Because current infrastructure does not have enough capacity to accommodate the increase in usage under Alternative C, effects to electricity are considered significant. Mitigation measures are provided in **Section 5.2.8**, which would reduce impacts to less than significant.

There is the potential for excessive electrical usage at the casino due to air leaks, heating and cooling waste, and inefficient lighting, appliances, and electrical equipment. While these impacts are not expected to be significant, **Section 5.2.8** presents mitigation measures and management practices related to energy conservation to ensure impacts remain less than significant. Additionally, the Tribe has committed in the MOU (DEIS Vol. I, **Appendix C**) with Clark County and Section 3(G) of the EPHS Ordinance (**Appendix U** of FEIS) to develop the property consistent with CCC Chapter 14.28A, Clark County Energy Code and Chapter 14.04, Building Code. These measures would increase the electrical and economic efficiency of the Proposed Project, ensuring that impacts remain less than significant.

Alternative C would utilize natural gas from NW Natural. The cost to the applicant of extending service from the nearest existing main (approximately 1 mile south) is based on a cost benefit analysis of the improvement. NW Natural has identified that it is likely that there would be no cost for extension to the La Center Interchange Site (Walstra, pers. communication, 2006). NW Natural is currently planning on extending service to the vicinity of the La Center Interchange Site due to projected commercial and industrial demands in the area. As natural gas service is planned in this area the impact is considered less than significant.

Qwest currently provides telephone service to the La Center Interchange Site. Comcast provides cable services. The Tribe would utilize these or similar services. Qwest and Comcast have the technical capacity to supply Alternative C with adequate telecommunication services. Therefore, development of telephone and cable services on the site is not expected to be a significant impact as the Tribe intends to provide their portion of the necessary funding for the installation and operation of services. No significant effects to local service would occur.

PUBLIC HEALTH AND SAFETY

Refer to the discussion under Alternative A for public health and safety issues agreed to in the MOU/EPHS Ordinance.

Law Enforcement

National studies have not found a statistically significant connection between casino gambling and crime as discussed under Alternative A. As with Alternative A, Alternative C could cause increased demands on law enforcement, prosecution, and court and jail services due to the presence of increased numbers of patrons at the La Center Interchange Site. However, due to the reduced size of Alternative C it is expected that the demands would be somewhat less than those experienced under Alternative A. The Tribe has committed to reimburse Clark County for law enforcement, prosecution, and court and jail services in Section 3.0 of the MOU (DEIS Vol. I, **Appendix C**) and Section 3(A) and (B) of the EPHS Ordinance (**Appendix U** of FEIS). Commitments in the MOU/EPHS Ordinance and issues of change in criminal jurisdiction are discussed under Alternative A and in **Section 2.0**, Alternatives and **Section 3.10**, Public Services. Without funding, impacts to the Sheriff's Office and County court and jail services would likely strain or exceed existing resources. However, impacts to law enforcement would be mitigated through the Clark County MOU and a contractual agreement with the Clark County Sheriff's Office (Lucas, 2005), thereby reducing the impacts to less than significant. Mitigation measures to further reduce impacts to law enforcement services and ensure they remain less than significant are identified in **Section 5.2.8**.

Fire Protection and Emergency Medical Services

Construction and operation on the La Center Interchange Site would create risks from fires; these risks and precautions to reduce the risk of fire are discussed in detail under Alternative A. As with Alternative A, fire suppression components on site include fire sprinkler systems, fire hydrants, and a closed-tank water reservoir to provide water at the required flow of 2,500 gpm for 2 hours. To address the potential of an increased need for fire protection and emergency medical services resulting from the development of Alternative C, the Tribe has committed, in Section 6.0 of the MOU and Section 3(C) of the EPHS Ordinance, to reimburse CCFD 12 for costs relating to the provision of such services. Specific details on provisions of the MOU/EPHS Ordinance are discussed under Alternative A. Impacts related to response times for emergency services due to traffic impacts are discussed in **Section 4.8**. Emergency medical services would be provided by AMR and Legacy Salmon Creek Hospital. Due to the reduced size of Alternative C it is expected that the impacts to emergency services would be less than those discussed under Alternative A, although similar. Based on the obligations assumed by the Tribe under the MOU/EPHS Ordinance, as well as the capacity of existing emergency medical services, the impacts on fire and emergency services would be less than significant. Mitigation measures to further reduce impacts to fire and emergency services and ensure they remain less than significant are identified in **Section 5.2.8**.

4.10.4 ALTERNATIVE D – BUSINESS PARK

WATER SUPPLY

Alternative D includes office space, warehouse, and light industrial uses. No wastewater treatment plant or use of recycled water is proposed under this alternative. The Tribe has expressed its intent to contract with CPU and pay the expenses associated with delivery of service to the La Center Interchange Site; CPU has consented through service agreement letters to enter into negotiations and to contract with the Tribe (DEIS Vol. III, **Appendix BB**).

As stated under Alternative A above, the CPU water facilities have a pumping capacity of 27 mgd and a storage capacity of 17 million gallons (Olson Engineering, 2006b). CPU could provide 1,100 gpm for water service and 1,700 gpm for fire service. Alternative D at peak day demand would use approximately 50,000 gpd from CPU (Olson Engineering, 2006b). This represents 0.2% of CPU's pumping capacity. On average Alternative D would use 25,000 gpd, or less than 0.1% of CPU's pumping capacity. These estimates do not include planned improvements to the CPU system.

No significant effects to the water supply distribution facilities would occur as a result of Alternative D. However, 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. In the event of a water shortage or increase in demand on the CPU system that would prevent CPU service from being obtained, potentially significant impacts could occur including the inability to meet water consumption needs and insufficient fire flows in the case of an emergency. Mitigation measures are provided in **Section 5.2.8** to ensure that an adequate water supply is available for the operation of Alternative D, and for the necessary fire flows. With mitigation measures the impact would be less than significant.

WASTEWATER SERVICE

No on-site wastewater treatment plant is proposed for Alternative D. As noted in **Section 3.9**, Land Use, the La Center Interchange Site has been included within the Urban Growth Area (UGA) of the City of La Center with the adoption of the update to the Clark County Growth Management Plan. As the site is now contained within the La Center UGA, the Tribe would negotiate with the City for connection to the municipal wastewater system for off-site disposal of wastewater.

The wastewater treatment system for the City of La Center has a capacity of 0.56 mgd (Olson Engineering, 2006b). To meet future wastewater flows, the City of La Center has commissioned long-range sewage facilities studies to identify options for providing the anticipated level of service. The City is considering converting from a sequencing batch reactor plant to a membrane bioreactor (MBR) plant. To service Alternative D, the Tribe or the City would need to construct a sanitary lift station and 1.5 miles of force main to the nearest connection point. Additionally, permitted discharge to the Lewis River from the City of La Center treatment plant would need to be increased. A

permitted increase in discharge has a timeline of three to five years from submittal, meaning that the system could not support Alternative D within its current construction timeframe.

The estimated average wastewater flow for Alternative D is 24,567 gpd and the estimated design peak flow is 50,000 (Olson Engineering, 2006b). The peak demand would represent 8.8% of treatment capacity for the City of La Center. The average demand would represent 4.4% of treatment capacity for the City. Because current infrastructure is insufficient to accommodate the needs of Alternative D and there are no agreements in place to obtain wastewater service from the City of La Center, this impact is considered significant. Mitigation measures are presented in **Section 5.2.8** to reduce impacts from wastewater disposal to less than significant.

Alternatively, the Tribe could negotiate with the City of Ridgefield for wastewater treatment services. The City of Ridgefield wastewater treatment system has a capacity of 0.5 MGD and a permitted discharge to the Lake River of 0.8 MGD. Proposed improvements to the City's wastewater system include increasing plant capacity to 1.8 MGD and construction of an outfall to the Columbia River (Olson Engineering, 2006b). To service Alternative D the City of Ridgefield would need to speed up planned improvements and the Tribe would need to fund improvements for discharge quality to allow for more discharge to the Lake River. The Tribe would also need to construct approximately 2.5 miles of force main to the nearest proposed lift station or approximately 4.5 miles of force main directly to the treatment plant. Potentially significant impacts may result from connection to the City of Ridgefield wastewater treatment system as described in more detail in **Section 4.10.5**. These impacts would be reduced through the implementation of mitigation measures recommended for Alternative E in **Section 5.2.8**.

SOLID WASTE SERVICE

Construction

The construction of Alternative D would result in a temporary increase in construction waste. Waste that cannot be recycled would be disposed of at the Finley Buttes Landfill in Boardman, Oregon, which accepts construction and demolition materials. This impact would be temporary and not significant given that the landfill has an adequate capacity to accommodate the increase in the amount of waste generated by the construction of Alternative D (Rogers, pers. communication, 2005). Mitigation measures are presented in **Section 5.2.8** to further reduce the amount of construction and demolition materials disposed of at the landfill and ensure impacts remain less than significant.

Operation

It is anticipated that the Tribe will contract with Waste Connections, Inc., or a similar company, for solid waste collection service. All waste would be brought to the Central Transfer and Recycling Center, compacted, and then transported by barge to the Finley Buttes Landfill.

Waste generation can be estimated using a generation rate based on employees, similar to the analysis used for Alternative A. Based on generation rates for similar facilities, Alternative D, which is estimated to create 2,991 jobs (E.D. Hovee, 2006a) would generate approximately 3,589 to 5,085 tons of solid waste per year. This represents less than 0.9% of the Finley Buttes Landfill's intake, which is considered less than significant. To reduce the volume of trash even further, a compactor would be used. Methods of trash reduction are similar to those described under Alternative A and mitigation measures to further reduce impacts from solid waste generation, and ensure they remain less than significant, are described in **Section 5.2.8**.

ELECTRICITY, NATURAL GAS, AND TELECOMMUNICATIONS

Construction

Construction on site could damage underground utilities, leading to outages and/or serious injury. This impact is potentially significant but with mitigation measures identified in **Section 5.2.8**, it would be less than significant.

Operation

Alternative D, a business park, would use less electrical equipment and have shorter hours of operation when compared to the components of Alternative A. The estimated electrical usage for business park developments is based on the planning standard of 30 to 35 kW per developed acre (Morris, pers. communication, 2005b). As Alternative D would entail the development of approximately 64 of the 151.87 acres the estimated usage is 1,920 to 2,240 kW. CPU has indicated that it has extra generation capacity available to provide service to Alternative D (Morris, pers. communication, 2005a). The same improvements would also be needed as those listed for Alternative A, including a new substation near the site, as well as new feeder and transmission lines. CPU and the Tribe have expressed their intent to enter into negotiations for electrical service (DEIS Vol. III, **Appendix BB**). While negotiations are not complete, it is expected that for service, CPU would charge the Tribe based on the percentage of load used from the new substation while costs of construction of the new transmission line and substation would be borne by CPU. Because current infrastructure does not have enough capacity to accommodate the increase in usage under Alternative D, effects to electricity are considered significant. Mitigation measures are provided in **Section 5.2.8**, to reduce impacts to less than significant.

There is the potential for excessive electrical usage under Alternative D due to air leaks, heating and cooling waste, and inefficient lighting, appliances, and electrical equipment. While such effects are not expected to be significant, **Section 5.2.8** presents mitigation measures and management practices related to energy conservation to ensure impacts remain less than significant. Additionally, the Tribe has committed in the MOU (DEIS Vol. I, **Appendix C**) with Clark County and Section 3(G) of the EPHS Ordinance (**Appendix U** of FEIS) to develop the property consistent with CCC Chapter 14.28A, Clark County Energy Code and Chapter 14.04, Building Code. These measures will increase

the electrical and economic efficiency of the Proposed Project, ensuring that impacts remain less than significant.

Alternative D would utilize natural gas from NW Natural. The cost to the applicant of extending service from the nearest existing main (approximately 1 mile south) is based on a cost benefit analysis of the improvement. NW Natural has identified that it is likely that there would be no cost for extension to the La Center Interchange Site (Walstra, pers. communication, 2006). NW Natural is currently planning on extending service to the vicinity of the La Center Interchange Site due to projected commercial and industrial demands in the area. As natural gas service is planned in this area the impact is considered less than significant.

Qwest currently provides telephone service to the La Center Interchange Site. Comcast provides cable services. The Tribe would utilize these or similar services. Qwest and Comcast have the technical capacity to supply Alternative D with adequate telecommunication services. Therefore, development of telephone and cable services on the site is not expected to be a significant impact as the Tribe intends to provide their portion of the necessary funding for the installation and operation of services. No significant effects to local service would occur.

PUBLIC HEALTH AND SAFETY

Refer to the discussion under Alternative A for public health and safety issues agreed to in the MOU/EPHS Ordinance, which also applies to Alternative D.

Law Enforcement

Alternative D could cause increased demands on law enforcement, prosecution, and court and jail services due to the presence of increased numbers of persons at the La Center Interchange Site. However, demands would be less than Alternative A due to the reduced hours of operation. Additionally, less employees and patrons are expected for a business park than for an entertainment facility. The Tribe has committed to reimburse Clark County for law enforcement, prosecution, and court/jail services in Section 3.0 of the MOU (DEIS Vol. I, **Appendix C** and Section 3(A) and (B) of the EPHS Ordinance (**Appendix U** of FEIS). Commitments in the MOU and issues of change in criminal jurisdiction are discussed under Alternative A and in **Section 2.0**, Alternatives and **Section 3.10**, Public Services. Without funding, impacts to the Sheriff's Office and County court and jail services would likely strain or exceed existing resources. However, impacts to law enforcement would be mitigated through the Clark County MOU and a contractual agreement with the Clark County Sheriff's Office (Lucas, 2005), thereby reducing the impacts to less than significant. Mitigation measures to further ensure impacts remain less than significant are identified in **Section 5.2.8**.

Fire Protection and Emergency Medical Services

Construction and operation on the site would create additional risks from fires; these risks and precautions to reduce the risk of fire are similar to those described for Alternative A. Fire suppression components on site would include fire sprinkler systems and fire hydrants at a flow of 2,500 gpm for 2 hours. To address the potential of an increased need for fire protection and emergency medical services resulting from the development of Alternative D, the Tribe has committed, in Section 6.0 of the MOU and Section 3(C) of the EPHS Ordinance, to reimburse CCFD 12 for costs relating to the provision of such services. Specific details on provisions of the MOU are discussed under Alternative A. Impacts related to response times for emergency services due to traffic impacts are discussed in **Section 4.8**. Emergency medical services would be provided by AMR and Legacy Salmon Creek Hospital. Impacts to emergency services would be similar to those discussed under Alternative A. Based on the obligations assumed by the Tribe under the MOU/EPHS Ordinance, as well as the capacity of existing emergency medical services, the impacts on fire and emergency services would be less than significant. Mitigation measures are identified in **Section 5.2.8** to ensure they remain less than significant.

4.10.5 ALTERNATIVE E – RIDGEFIELD INTERCHANGE SITE

WATER SUPPLY

Alternative E includes a casino-resort complex, RV park, and Tribal facilities (elder housing, cultural center, and offices) at the Ridgefield Interchange site, located within the Ridgefield UGA and the CPU water service area. Under this Alternative, water would be supplied by CPU. The Tribe intends to contract for water services with CPU through a services agreement, similar in intent and scope to the agreement for services for the La Center Interchange Site (DEIS Vol. III, **Appendix BB**).

CPU has anticipated growth in this area and has sized lines, storage and sources to provide service to the site. A 16 inch line, which exists along the east side of the property, has the capacity and pressure to serve the site with no extra storage required. The CPU water facilities have a pumping capacity of 27 mgd and a storage capacity of 17 million gallons. The average water usage for Alternative E is estimated at 458,632 gpd and would represent 1.7% of CPU's pumping capacity (Olson Engineering, 2006b). The peak day demand for Alternative E is estimated at 739,000 gpd, which would represent 2.7% of CPU's water pumping capacity. As there is no existing agreement to contract for water services at the Ridgefield Interchange Site, effects to the local water supply are considered potentially significant. Mitigation measures are provided in **Section 5.2.8** to ensure that an adequate water supply is available for the operation of Alternative E, and for the necessary fire flows. With mitigation measures the impact would be less than significant.

WASTEWATER SERVICE

For wastewater service, Alternative E would utilize the City of Ridgefield municipal wastewater system, including the treatment plant. The Tribe would enter into a service agreement with the City of Ridgefield and pay user and development fees for service.

The City of Ridgefield wastewater treatment system has a capacity of 0.5 mgd and a permitted discharge to Lake River of 0.8 mgd. Improvements to the City's wastewater system include increasing plant capacity to 1.8 mgd and construction of an outfall to the Columbia River (Olson Engineering, 2006b). To service Alternative E, the City of Ridgefield would need to speed up planned improvements, including constructing a planned outfall to the Columbia River, and the Tribe would need to fund improvements for discharge quality to allow for more discharge to the Lake River. Additionally, the Tribe would be required to conduct additional investigations and analysis, in support of the City's planning efforts and NPDES application. The Tribe would also need to construct approximately 2.5 miles of force main to the nearest proposed lift station or approximately 4.5 miles of force main directly to the treatment plant.

Average flows from Alternative E are approximately 293,000 gpd, which is over the capacity of the current municipal treatment plant. Because current infrastructure is insufficient, the impact to the municipal wastewater system would be significant. Mitigation measures are presented in **Section 5.2.8**, which would reduce impacts to less than significant.

SOLID WASTE SERVICE

Construction

The construction of Alternative E would result in a temporary increase in waste generation similar in composition and volume to Alternative A. Waste that cannot be recycled would be disposed of at the Finley Buttes Landfill in Boardman, Oregon, which accepts construction and demolition materials. This impact would be temporary and not significant given that the landfill has an adequate capacity to accommodate the increase in the amount of waste generated by the construction of Alternative E (Rogers, pers. communication, 2005). Mitigation measures are presented in **Section 5.2.8** to further reduce the amount of construction and demolition materials disposed of at the landfill and ensure that impacts remain less than significant.

Operation

It is anticipated that the Tribe will contract with Waste Connections, Inc., or a similar company, for solid waste collection service. All waste would be brought to the Central Transfer and Recycling Center, compacted, and then transported by barge to the Finley Buttes Landfill. The components of Alternative E have identical uses and are substantially similar in size to Alternative A; therefore, it is reasonable to assume that waste generation would be similar to that of Alternative A at an estimated generation of 14 tons per day. This represents approximately 0.9% of the Finley Buttes Landfill's

intake, which is considered less than significant. To reduce the volume of trash, a compactor would be used. Methods of trash reduction are similar to those described under Alternative A and mitigation measures to further reduce impacts from solid waste generation are described in **Section 5.2.8**.

ELECTRICITY, NATURAL GAS, AND TELECOMMUNICATIONS

Construction

Construction on site could damage underground utilities, leading to outages and/or serious injury. This impact is potentially significant. Mitigation measures are presented in **Section 5.2.8** to reduce impacts to less than significant.

Operation

The estimated electrical load for Alternative A is 27,631 kW with a 10% contingency (Roche, pers. communication, 2005), and the components of Alternative E have identical uses and are substantially similar in size; therefore, it is reasonable to assume that the electrical load would be similar to that of Alternative A. The nearest substation to the Ridgefield Interchange Site is CPU's Ridgefield Substation, which has the capacity to serve the site (Morris, pers. communication, 2005a). The substation is located at NE 264th Street and NE 10th Avenue, less than 1 mile from the Ridgefield Interchange Site. Electricity would be routed to the site from the substation, then transferred and divided by private transformers on site. CPU would charge the Tribe based on the percentage of load used from the substation. The Tribe intends to contract for electrical services with CPU through a services agreement, similar in intent and scope to the agreement being negotiated for the La Center Interchange Site (DEIS Vol. III, **Appendix BB**). Emergency back-up generators would be provided under Alternative E. Because the regional electrical provider has the capacity and infrastructure to serve the Ridgefield Interchange Site, the effects to electricity are considered less than significant.

There is the potential for excessive electrical usage at the casino due to air leaks, heating and cooling waste, and inefficient lighting, appliances, and electrical equipment. While these impacts are not expected to be significant, **Section 5.2.8** presents mitigation measures and management practices related to energy conservation to ensure impacts remain less than significant. These measures would increase the electrical and economic efficiency of Alternative E, ensuring that impacts remain less than significant.

Alternative E would utilize natural gas from NW Natural. There is a line adjacent to the west and south of the site along N 65th Avenue and S 5th Street (refer to **Figure 3.10-2**). The cost to the applicant of extending service onto the site based on a cost benefit analysis of the improvement. If the cost to extend to the property is less than the benefit over 5 years then there is no charge to the applicant for extension. It is likely that based on the amount of use by Alternative E there would be no cost for the extension of service as it is similar in size and use to Alternative A. As natural gas

service is planned in this area the impact is considered less than significant. No mitigation is necessary.

Qwest currently provides telephone service to the Ridgefield Interchange Site. Comcast provides cable services. The Tribe would utilize these or similar services. Qwest and Comcast have the technical capacity to supply Alternative E with adequate telecommunication services. Therefore, development of telephone and cable services on the site is not expected to be a significant impact as the Tribe intends to provide their portion of the necessary funding for the installation and operation of services. No significant effects to local service would occur.

PUBLIC HEALTH AND SAFETY

Under Alternative E, the Tribe would form an agreement similar in intent and scope to the MOU with Clark County (DEIS Vol. I, **Appendix C**) and the EPHS Ordinance (**Appendix U** of FEIS), in which the Tribe agrees to follow health regulations adopted by the State of Washington and Clark County. This agreement would include obtaining required health permits and allowing inspectors access to the property to ensure compliance with the State and County regulations. The Tribe would follow applicable County building and fire codes to prevent injury to workers and patrons. Once the Tribe has formalized an agreement with Clark County to follow State and County public health and safety standards, impacts would be less than significant levels.

Law Enforcement

Under Alternative E the Tribe would negotiate with the Clark County Sheriff's Office to provide law enforcement, prosecution, and court and jail services to the Ridgefield Interchange Site.

National studies have not found a statistically significant connection between casino gambling and crime as discussed under Alternative A. Alternative E could cause increased demands on law enforcement, prosecution, and court and jail services due to the presence of increased numbers of persons at the Ridgefield Interchange Site. Similar to Alternative A, it is estimated that Alternative E would result in between 200 to 1,000 calls for service per year resulting in between 50 to 200 crime reports per year. Issues of change in criminal jurisdiction are discussed under Alternative A and in **Section 2.0**, Alternatives and **Section 3.10**, Public Services. Increased demands on law enforcement are significant and mitigation is identified in **Section 5.2.8**. However, impacts would be less than significant subsequent to finalization of an agreement with Clark County regarding the provision of law enforcement services similar to the agreement for the La Center Interchange Site. Alternatively, the Tribe could contract with the City of Ridgefield Police Department and provide compensation to the Department for additional demands.

Fire Protection and Emergency Medical Services

Construction and operation on the site create additional risks from fires; these risks and precautions to reduce the risk of fire are similar to those described for Alternative A. Fire suppression components on site would include fire sprinkler systems and fire hydrants at a flow of 2,500 gpm for 2 hours. To address the potential of an increased need for fire protection and emergency medical services resulting from the development of Alternative E, the Tribe would obtain a service agreement from CCFD 12 to provide fire protection and emergency medical services similar in scope and intent to that described in the MOU (DEIS Vol. I, **Appendix C**) with Clark County and Section 3(C) of the EPHS Ordinance (**Appendix U** of FEIS). Impacts related to response times for emergency services due to traffic impacts are discussed in **Section 4.8**. Emergency medical services would be provided by AMR and Legacy Salmon Creek Hospital. Increased demands on fire and emergency services are significant. However, impacts would be less than significant subsequent to finalization of an agreement with Clark County regarding the provision of fire protection and emergency medical services similar to the agreement for the La Center Interchange Site. Additional mitigation measures are identified in **Section 5.2.8** to ensure impacts remain less than significant.

4.10.6 ALTERNATIVE F – NO ACTION

WATER SUPPLY

Under the No Action Alternative, no land would be taken into trust and no Tribal project would be constructed. No additional water supply would be necessary until such time as the alternative project sites are developed consistent with local plans and zoning. Because future urban development is planned in the Clark County Comprehensive Growth Management Plan (GMP), effects to water supply have already been addressed and mitigation provided. A less-than-significant impact would result from the No Action Alternative.

WASTEWATER AND SOLID WASTE SERVICE

Under the No Action Alternative, no land would be taken into trust and no Tribal project would be constructed. Existing residents on the alternative project sites would continue to be served by private septic systems. No additional wastewater treatment or discharge would be required, and solid waste generation would remain the same until such time as the land is developed consistent with local plans and zoning. Because future urban development is planned in the Clark County Comprehensive GMP, impacts from increased wastewater treatment and solid waste generation have already been addressed and mitigation provided. A less-than-significant impact would result from the No Action Alternative.

ELECTRICITY, NATURAL GAS, AND TELECOMMUNICATIONS

Under the No Action Alternative, no land would be taken into trust and no Tribal project would be constructed. Existing residents would continue to be served by CPU, NW Natural, Qwest, and

Comcast. The No Action Alternative would not result in impacts to electricity, natural gas, or telecommunications.

PUBLIC HEALTH AND SAFETY

Under the No Action Alternative, no land would be taken into trust and no Tribal project would be constructed. In the future, if one of the alternative project sites is developed consistent with local plans and zoning, the development(s) would be subject to State and County public health regulations, inspections, building codes, and fire codes. The No Action Alternative would not result in impacts to public health and safety.

Law Enforcement, Fire Protection, and Emergency Medical Services

Under the No Action Alternative, no land would be taken into trust and no Tribal project would be constructed. The No Action Alternative would not result in increased demands on law enforcement, fire protection, or emergency medical services.