

4.7 SOCIOECONOMIC CONDITIONS

4.7.1 ALTERNATIVE A – PREFERRED CASINO-RESORT PROJECT

DIRECT ECONOMIC EFFECTS

Construction

Construction required for Alternative A would generate substantial economic activity within Clark and Cowlitz counties. Direct impacts would primarily consist of expenditures to local construction and engineering firms necessary for construction of the project facilities. Construction impacts for the project alternatives are summarized in **Table 4.7-1**. The estimated cost of construction for Alternative A is \$510,260,000. Approximately 4,011 jobs would be generated over the entire construction period with an average wage of \$46,200 and a total payroll of \$185,292,000 (E.D. Hovee, 2006a). It is estimated that all construction workers would come from the region due to limited duration of jobs and longer commute patterns for the construction industry. This would be a beneficial economic impact to the region. No mitigation is required.

TABLE 4.7-1
DIRECT ECONOMIC IMPACT DURING CONSTRUCTION – ALTERNATIVES A - E

Direct Construction Impacts	Alternatives A and B	Alternative C	Alternative D	Alternative E
Number of Employees	4,011	2,272	999	2,904
Expenditures	\$510,260,000	\$289,055,000	\$127,145,000	\$369,407,000

Source: E.D. Hovee, 2006a.

Operation

Operational impacts for the project alternatives are summarized in **Table 4.7-2**. Alternative A is expected to employ 3,151 employees with an average wage of \$28,000 and a total annual payroll of \$88,135,000 (E.D. Hovee, 2006a). The average wage is equivalent to the 2003 average wage of jobs in the primary area and 82% of the average wage in the secondary area. The percentage is lower for the secondary area due to higher wages in the urban area of Vancouver. These wages are almost 60% higher than Clark County wages within comparable industries (E.D. Hovee, 2006b) and 23% higher than arts, entertainment, and recreation wages in the La Center area (E.D. Hovee, 2006a). As there are approximately 1.64 wage earners per household in Clark and Cowlitz counties, the total household income for these employees is projected to be on average 1.64 times the wages of the employee. The estimated median household income for all jobs under Alternative A is \$39,500 (E.D. Hovee, 2006b). Estimated household incomes are generally above levels that would qualify for public assistance. For example, based on average household size and number of workers per household, there would be no casino job associated with a household income below \$19,480 annually,

the level qualifying for federal food stamps. However, individual household characteristics vary in the number of wage earners and dependents per household. Thus, a household with one wage earner, earning in the lowest quintile of casino wages, and with three or more dependents, would fall below the poverty line (E.D. Hovee, 2006b).

TABLE 4.7-2
DIRECT ANNUAL OPERATING SOCIOECONOMIC IMPACT – ALTERNATIVES A - E

Direct Operation Impacts	Alternatives A and B	Alternative C	Alternative D	Alternative E
Number of Employees	3,151	2,156	2,991	3,095
Estimated Gaming Revenue	\$415,152,000	\$ 244,109,000	--	\$437,202,000

Source: E.D. Hovee, 2006a.

The portion of employees who would already reside in Clark and Cowlitz counties is estimated at 90% (variable between 85-95%). This number is based on a detailed area labor market analysis and a review of comparable facilities, discussed in detail in Appendix B to the *Cowlitz Casino Project: Socioeconomic Assessment* (E.D. Hovee, 2006a) (DEIS Vol. II, **Appendix S**).

The estimated amount of gaming revenue, based on figures provided by Salishan-Mohegan, LLC, for similar gaming facilities is \$415,152,000 per year. These numbers are high estimates because some of these receipts would be accounted for by the substitution effect. “Substitution effect” means that not all of the jobs and economic effects resulting from an alternative would be ‘new’ to the region, as they would merely be transfers of spending within the region. Operational revenues would be a significant, beneficial impact to the economics of the region. No mitigation is required.

Impacts to Local Jurisdictions

Alternative A would benefit not only Tribal members by allowing the Tribe to generate revenue with which it can provide governmental, health, education, and social services to its members, but also non-Indian community members as well, through increased spending and economic opportunities off site. This expectation is supported by analyses that have examined the impacts of Indian gaming and regional economic activity in the State, including a study prepared for the Washington Indian Gaming Association entitled *Tribal Self-Government and Gaming Policy: The Consequences for Indians and Washington State* (Taylor, 2005) (DEIS Vol. III, **Appendix Z**). Funds spent at the casino cycle back to the region through off-site purchases for goods and services, which in turn have tax implications, providing revenue for the local jurisdiction and the state (Taylor, 2005). Additionally, workers at the casino are more likely to spend their wages in the local economy as the majority would be local residents. The public costs to local jurisdictions from patrons and guests include fire, police, problem gambling, and transportation costs, and are comparable to other commercial gaming facilities. These

costs are addressed in the respective sections of this Environmental Impact Statement (EIS) including **Section 4.10** (Public Services), **Section 4.8** (Transportation/Circulation), and **Section 4.7** (Social Effects, below).

Local jurisdictions and agencies would receive one-time state sales tax revenues from construction purchases related to Alternative A. Construction of Alternative A is expected to occur over approximately 20 months. Expenditures would be distributed throughout this time period and occur relatively regularly with the exception of some larger purchases which would temporarily increase the rate of purchases (steel, furnishings, etc.) These funds would be collected by the local businesses and distributed by the State to the County as required by current Washington State law. These funds would total approximately \$39,290,000 (E.D. Hovee, 2006a). Given the construction period, sales tax should be paid within a 2-year period (E.D. Hovee, 2006b).

Under Alternative A, land would be taken into trust and would no longer be subject to annual state and local property, sales, or hotel/motel taxes. If Alternative A were subject to these taxes, non-gaming sales tax would equal approximately \$9,836,000 and would be distributed to the State, County, and local criminal justice departments. Similarly, if subject to local property tax, property tax revenues from Alternative A would total approximately \$4,009,000 and would be distributed to local schools, the Fort Vancouver Regional Library, Clark County Fire District 12 (CCFD) 12, the Port of Ridgefield, Clark County, and other entities. The estimated hotel/motel tax if Alternative A were subject to this tax would be approximately \$367,000, which would be distributed to the State, County, and local criminal justice departments. Additionally, the Tribe has agreed to pay a \$2.00 per night surcharge on hotel rooms to the Southwest Washington Convention and Visitor's Bureau for regional visitor and convention promotion (DEIS Vol. III, **Appendix BB**). This is similar to the surcharge added to other eligible area lodging businesses and estimated to total approximately \$102,000. The total of these annual tax revenues would be approximately \$14,314,000 (**Table 4.7-3**).

The Tribe has committed in Section 11 of the Memorandum of Understanding (MOU) with Clark County (DEIS Vol. I, **Appendix C**) and Section 3(H) of the Tribe's Environment, Public Health and Safety (EPHS) Ordinance (**Appendix U** of the FEIS) to collect sales tax on non-Indian sales, to make payments in lieu of property taxes, and to make an annual payment equivalent to the hotel/motel or transient occupancy tax. It is agreed by correspondence between the County and Tribe that payment in lieu of taxes includes all property taxes which would have been received for the real property, improvements and personal property located in Clark County had the Tribe been subject to property taxes (**Appendix W**). As stated above, this amount would total approximately \$14,314,000. This would be a beneficial impact to the region. No mitigation is required.

TABLE 4.7-3
ESTIMATED ANNUAL IN-LIEU PAYMENTS

	Alternatives A and B	Alternative C	Alternative D
Property Tax			
Estimated future property value	\$664,012,000	\$376,446,000	\$165,963,000
Tax Rate / \$1,000 tax assessed value	\$6.03796	\$6.03796	\$6.03796
Total	\$4,009,000	\$2,273,000	\$1,002,000
Sales Tax			
Estimated taxable annual sales (retail/food)	\$132,918,000	\$73,669,000	\$33,356,000
Tax Rate	7.4%	7.4%	7.4%
Total	\$9,836,000	\$5,451,000	\$2,468,000
Hotel/Motel Tax			
Total Revenue	\$3,907,000	\$3,125,000	-
Tax Rate	9.4%	9.4%	-
Subtotal	\$367,000	\$294,000	-
SWWCVB hotel surcharge	\$102,000	\$82,000	-
Total (Hotel/Motel Tax + SWWCVB surcharge)	\$469,000	\$376,000	-
Total Estimated In-Lieu Payments	\$14,314,000	\$8,100,000	\$3,470,000

Notes: Values rounded to nearest thousand.

*Tax Rate Components for 2007 (Subject to Annual Change) – Total \$6.03796 including County General, Local Schools, Port of Ridgefield, Fire District 12, Ft Vancouver Regional Library, Roads.

SWWCVB = Southwest Washington Convention & Visitor's Bureau.

Source: E.D. Hovee, 2006a; AES, 2007.

Impacts to Surrounding Property Values

Negative value impacts to nearby large rural homes situated near the La Center Interchange Site, could occur to the extent they are affected by any noise, traffic, shadow, lights, or glare generated by this alternative. Such effects tend to affect public perception of quality of life and property values for residential properties. However, recent studies have found that there is no statistically discernable effect on property values in communities near reservations or casinos (Taylor, 2006; EcoNorthwest, 2006). While land would become less valued for residential purposes, properties surrounding the project site may increase in value due to speculation for commercial growth. Concurrently, while only minimal indirect and growth inducing impacts are expected, such impacts and the accompanying

pressure to convert agricultural land to the service economy may result in increased values for undeveloped land. This is a beneficial impact. No mitigation is required.

Impacts to Existing Indian Casino Gaming Market

There are two Indian gaming casinos within 100 miles of the project alternatives. They are located in Grand Ronde, Oregon, approximately 85 miles to the southwest, and Rochester, Washington, approximately 80 miles to the north. Alternative A is located closer to the Portland metropolitan area than either of these two casinos and is well situated to intercept the Portland metropolitan customer base. However, market analysis would place the Portland metropolitan customer base in the outer ring of both frequency distribution and capture rate diagrams. In essence only a small portion of the revenue of these two casinos comes from the Portland area; both the Grand Ronde and Rochester casinos are located near Interstate 5 (I-5) and derive their primary customer base from travelers and local residents in their areas. Additionally, both Indian casinos within 100 miles are currently located within 25 miles of other Indian gaming facilities. Overall, Oregon and Washington have as many as 28 different tribes operating multiple gaming facilities throughout the two states. The general conclusion of this analysis is that the market is not approaching saturation. Accordingly, development of Alternative A would have a less than significant impact on other Indian gaming facilities. No mitigation is required.

Impacts to Spirit Mountain

An analysis of the competitive market effects to the Spirit Mountain Casino was completed by E.D. Hovee (2007a) and is included as **Appendix L** of the FEIS. The Spirit Mountain Casino is located in Grande Ronde, Oregon and operated by the Confederated Tribes of Grande Ronde. The analysis included collecting background information and developing a gaming market model. The gaming model is based on an assessment of overall gaming revenues supported by population, incomes, typical win per visit and casino gaming participation both nationally and in the Pacific Northwest. Based on a baseline gaming market model as applied elsewhere in the U.S., it is reasonable to believe that Alternative A could operate by 2011 without significantly affecting existing operations of gaming facilities serving the Southwest Washington and Northwest Oregon gaming market. This conclusion is based on comparable national experience, no apparent market saturation in the area given rapid gaming growth to date, projected population and income growth in the region, and differing market areas for existing and proposed facilities. If Alternative A included up to 3,000 VLTs (video-lottery terminals) and generated revenues at the current regional per VLT average, the Spirit Mountain Casino could experience a potential loss of 13% in annual gaming revenue in 2011 (compared to current revenue levels). With increased competition, existing casinos will likely be placed in the position of needing to refine marketing and promotion programs aimed at retaining existing patrons. However, it is reasonable to believe that Alternative A could operate without substantial long-term adverse effects to operations of the existing Spirit Mountain facility.

Impacts to the City of La Center and the Port of Ridgefield

Substitution effects to revenues from the card rooms in La Center are expected to result in as much as a 66% decline in gambling tax revenues received by the City of La Center (EcoNorthwest, 2006). This anticipated decrease in revenue is expected to result in either 1) the four card rooms operating at a reduced level, or alternatively, 2) due to competition for market share, a reduction in the number of operating card rooms. A 66% decline in gaming tax revenues equates to an estimated \$3.1 million revenue loss to the City of La Center. However, \$1.6 million per year in continued gaming tax revenue would continue to be paid to the City. This is well in excess of the \$823,000 (or 25% of gambling tax revenues) allocated by the City to its general fund as of 2005 (E.D. Hovee, 2006c). Thus, the primary impact would continue to be on a reduced build-up of the City's rainy-day fund used for capital improvements, rather than on the general fund supporting City services. Some of the discretionary fund is used on capital improvement projects for public facilities and thus this impact is considered potentially significant. Mitigation for replacement of lost revenue for at least 10 years is included in **Section 5.2.6**. It should be noted that alternate funding for capital improvement projects are available through federal and state grants, local bond measures, and/or increases in retail tax, permit fees, property tax or development fees. Thus, it is assumed that during the 10-year period of payments the City could arrange for alternative funding mechanisms similar to surrounding jurisdictions.

Additionally, the Tribe has offered to enter into an agreement with La Center to address the replacement of taxes and fees, and to provide for funding of capital facilities projects and certain transportation improvements. The agreement would also provide for payment for services provided by the City of La Center and could also address a joint marketing program with the City and the existing card rooms. The intent of a joint marketing program would be to 1) lessen economic impacts to the City of La Center; 2) reduce customer auto trips between the City of La Center and the casino through the establishment of a shuttle service; and 3) provide a greater array of customer amenities, thus increasing the area's share of the tourist market. At this time, an agreement between the City of La Center and the Tribe has not been reached.

Significant impacts are not expected for businesses located in the industrial park or other undeveloped properties owned by the Port of Ridgefield. As the industrial park businesses serve different purposes than Alternative A, there would be little fiscal or employment effect. General substitution effects are discussed in **Section 4.14**, Indirect and Growth-Inducing. Increased business in the area from Alternative A is likely to increase values for undeveloped properties rather than decrease values. Thus, the effect to the Port of Ridgefield is expected to be less than significant.

SOCIAL EFFECTS

Problem and Pathological Gambling

Substantial research has been conducted on the social costs associated with gambling across the nation, most comprehensively in a 1999 report issued by the National Gambling Impact Study Commission (NGISC). The NGISC commissioned companion reports on the issue of problem gambling by the National Research Council (NRC) and the National Opinion Research Center (NORC). The NGISC also “held hearings throughout the country, heard testimony on a number of relevant topics, reviewed thousands of articles and comments, and considered academic research” (NGISC, 1999).

The American Psychiatric Association (APA) describes pathological gambling as an impulse control disorder characterized by “persistent and recurrent maladaptive gambling behavior that disrupts personal, family, or vocational pursuits. The gambling pattern may be regular or episodic, and the course of the disorder is typically chronic” (NGISC, 1999). The APA identified ten criteria for diagnosis, which include preoccupation, tolerance, withdrawal, escape, chasing, lying, loss of control, illegal acts, risked significant relationship, and financial bailout. Pathological gamblers typically meet at least five criteria and problem gamblers between three and five. Collectively, both pathological and problem gambling are referred to as “problem gambling.”

The California State Office of Problem Gambling released a study entitled *Situational Assessment of Problem Gambling Services in California* (Volberg et al., 2005), which determined that the number of problem gamblers in California has risen from 0.8% to 1.3% since 1993 when casino gambling was relatively rare in California. According to the Office of Problem Gambling study, problem gambling may be attenuated, or possibly reversed, through the expansion of problem gambling services. Evidence of this is from studies done in Montana, Oregon, North Dakota, and Washington, each with newly opened tribal casinos and other forms of legal gambling available. According to the study (Volberg et al., 2005):

With respect to problem gambling, significant increases in prevalence were found in Montana and North Dakota. Significant decreases were found in Oregon and Washington. The major difference between states with increased and decreased gambling problems was the availability of services for problem gamblers.

While the prevalence of gambling problems decreased in Washington, we conservatively assume that as with the experience in California, where problem gambling rose from 0.8% to 1.3%, the introduction of a tribal casino may increase gambling problems in the community by approximately 0.5%. Additionally, the NORC study previously mentioned found a higher rate of problem and pathological gamblers within 50 miles of a casino (NORC, 1999). According to a 1999 prevalence

study done for the State of Washington, the number of past year problem and pathological gamblers is estimated at 2.3% of the adult population (Volberg et al, 1999). According to these estimates, of the 343,182 adults over 20 years of age in Clark and Cowlitz counties, approximately 7,893 (2.3%) are currently experiencing gambling problems requiring treatment (WOFM, 2005). The introduction of Alternative A may increase the percentage of problem gamblers by as much as 0.5% or an increase of approximately 1,716 persons.

According to Rachel Volberg's report *Gambling and Problem Gambling in Washington State*, approximately 3% of those with severe gambling problems will seek treatment in a given year (Volberg et al, 1999). Assuming 3%, or 52 persons, seek treatment, Alternative A could potentially increase costs to County/State programs. Available information from the Association of Problem Gambling Service Administrators (APGSA) indicates that the counselor to patient ratio for publicly funded programs varies widely. In 2003, the Oregon Problem Gambling Services program treated 1,810 patients with 30 certified counselors (APGSA, 2006). Similarly, the Nebraska Gamblers Assistance Program treated 793 individuals with 20 certified counselors. Based on the average ratio for these programs it can be assumed that approximately one counselor would be needed for every 52 persons. Given this patient-to-counselor ratio and the potential additional 52 people seeking treatment for problem gaming in Clark and Cowlitz counties, it is estimated that the County would need to hire one additional licensed counselor to treat the increased problem gambling population due to the development of Alternative A. According to the APA, the 2003 median annual salary for a master's-level position within counseling psychology was \$47,500 (Pate et al, 2005). The Northwest Recovery Center in Vancouver, Washington currently provides services to problem gamblers in Clark County who could not otherwise afford services. Similar programs throughout Washington are funded by the State through legislation passed in 2005. Thus, it is estimated that Alternative A would increase costs to the Northwest Recovery Center by the cost of one additional counselor, or \$47,500.

Secondary effects from problem gambling are more difficult to quantify. The gambler and his or her family may experience problems including involvement in crime, bankruptcy, divorce, domestic violence, and mental or physical health problems. Problem gambling often occurs with other behavioral and emotional problems that contribute to secondary issues, making correlation between problem gambling and secondary effects difficult. Treatment of problem gambling would lessen the impacts of these secondary effects.

It is important to note that there is already a relative ease of access to gambling, with four card clubs currently operating in La Center, internet gambling, and the presence of legal gambling opportunities in 48 states. Nonetheless, the Tribe is concerned about problem and pathological gamblers and the potential social and economic costs associated with pathological gamblers. With the new State treatment programs and funding from Tribes, including the Cowlitz Tribe, it is likely that prevalence rates for gambling problems will decline as documented in Washington from 1993-1999 (Volberg, et

al, 2005). The estimated increase in problem gamblers seeking treatment would require an additional licensed counselor in Clark County at an approximate cost of \$47,500. The Tribe has agreed in the MOU with Clark County and EPHS Ordinance to contribute no less than \$50,000 per year to compensate these service programs. With this contribution, effects to problem gambling services would be less than significant. No mitigation is required.

Crime Rates and Bankruptcy

Crime and other impacts to law enforcement services are addressed in **Section 4.10**, Public Services. Similar to crime, bankruptcy rates are commonly thought to increase within proximity to a casino; however, independent government research suggests no relationship exists between casino gaming and increased bankruptcy rates over the past decade. The U.S. Department of the Treasury investigated this issue in 1999 at the request of Congress and found “no connection between state bankruptcy rates and either the extent of or introduction of casino gambling. This result is supported by county-level analysis that shows no statistically significant casino effect [proximity to a casino] with regard to county bankruptcy rate” (U.S. Department of the Treasury, 1999). An analysis of community databases of over 100 communities nationwide conducted by NORC concluded that bankruptcies were no more common in communities with casinos than in communities that do not have casinos (NORC, 1999). Thus, impacts from bankruptcies associated with casino gaming would be less than significant. No mitigation is required.

EFFECTS TO THE COWLITZ INDIAN TRIBE

Alternative A would benefit the Tribe in at least two ways. First, it would generate new income to fund the operation of the Tribal Government. This income is anticipated to have a beneficial effect on Tribal attitudes, expectations, quality of life and culture by funding Tribal programs that serve Tribal members, including education, health care, housing, social services, and Tribally-sponsored cultural events, and by supporting Tribal self-sufficiency and self-determination. Second, Tribal members would have access to new jobs created by the casino and hotel. Employment generated by this Alternative would not only allow Tribal members to enjoy a better standard of living, but would also provide an opportunity for Tribal members to end their dependence on the welfare program. As discussed in **Section 3.7**, Socioeconomics, approximately 57 members live within commuting distance and work part-time or are unemployed but able to work. Approximately 91 members outside of commuting distance are employed part-time or unemployed, and are dissatisfied with their current housing situation (Roe, 2004). Therefore, the creation of employment opportunities is expected to benefit Tribal members as well as local taxpayers in general.

The casino is projected to generate millions of dollars annually for the Tribe. According to the Indian Gaming Regulatory Act (IGRA) 25 U.S.C. Section 2710 (b)(2)(B),

...net revenues from any tribal gaming are not to be used for purposes other than (i) to fund tribal government operations or programs; (ii) to provide for the general welfare of the Indian tribe and its members; (iii) to promote tribal economic development; (iv) to donate to charitable organizations; or (v) to help fund operations of local government agencies.

IGRA also requires that the Tribe develop a plan to use gaming revenues for these purposes, which must be approved by the Secretary of the Interior, before making any distributions to individual Tribal members. In the event that phasing of the project is required, these revenues received by the Tribe would be reduced during the initial phases of the project.

Like other Washington State tribes, the Cowlitz Indian Tribe will make financial contributions to local governments and community organizations through impact mitigation arrangements described in **Section 2**, Alternatives, and in the MOU with Clark County and EPHS Ordinance. These include the Cowlitz Tribe Education and Arts Fund, sales tax on non-Indian goods, and payments in lieu of property tax and hotel occupancy tax.

In addition to the anticipated economic benefits, acquisition of the land in trust, together with the proposed development, will provide the Tribe with a land base from which to operate a stable Tribal Government and governmental programs, develop further governmental expertise, and explore other economic opportunities. The Tribe also expects that the planned development of a cultural center on the parcel will help to solidify and preserve Tribal cultural identity and practices that have suffered from the dispersal of the Tribe's members over the last 150 years.

COMMUNITY INFRASTRUCTURE

Schools

If increased employment opportunities are responsible for a population increase in the area, school enrollments may be expected to increase. Based on student generation rates for Clark County's nine school districts there is an overall student generation rate for all housing units of 0.46 (E.D. Hovee, 2006c, **Appendix K** of the FEIS). Applying the rate of 0.46 students per household and an anticipated 315 households moving into the "secondary area," it is estimated that Alternative A would generate a maximum of 145 new students distributed throughout Clark and Cowlitz counties, which currently has 89,000 students and 144 schools (E.D. Hovee, 2006a). Impacts to the Ridgefield School District are confined to an increase in the number of students generated by the new permanent employment. As noted in the socioeconomic study (E.D. Hovee, 2006a) (DEIS Vol. II, **Appendix S**), the existing labor supply is sufficient for the proposed facility. Additionally, impacts to school enrollment are usually tied more directly to new housing than to employment. As the housing supply is more than adequate for any new employment, and any housing constructed in response to demand by new hires is likely to be fairly broadly distributed throughout the primary and secondary areas, no

significant effects are expected. Additionally, the Tribe has agreed, pursuant to an MOU with the Ridgefield School District (DEIS Vol. III, **Appendix AA**), to pay school impact fees to the District if the Tribe constructs single- or multi-family residential housing on land within the District's service area. This would ensure that impacts remain less than significant.

Libraries and Parks

Effects to area libraries and parks could occur if the employees or patrons of Alternative A significantly increase the demand on these resources. Due to the limited number of employees that are expected to relocate to the project area, as noted in **Section 3.7**, Socioeconomics, it is expected that these effects would be negligible. Additionally, due to the casino/resort character of Alternative A, it is not anticipated that patrons would frequent local libraries or parks. Therefore, there would be a less than significant effect to libraries and parks. No mitigation is required.

Quality of Life

“Quality of life” is defined variously by different people, but is generally composed of a number of different social and economic factors, including availability of public services such as schools and libraries, community appearance (aesthetics), perception of public safety, transportation factors (particularly those affecting commute time), and indirect and growth inducing effects. Effects in these environmental areas are generally described elsewhere in **Section 4.0**.

Other, more subjective factors, frequently put forward in the definition of quality of life are “sense of community,” “community character,” and “community values.” When referring to “sense of community,” people seem to mean to what extent they share the same values as the other people in the community. The more homogeneous a community, ethnically, racially, religiously, morally/ethically, and economically, the stronger the “sense of community.” The situation for the La Center Interchange Site is slightly complicated by the fact that the area is in transition, from a predominantly rural blue-collar community to a white-collar bedroom community for the greater Portland metropolis. This shift is perceived by residents as being a small change in the ethnic, economic and religious character of the area; which is predominantly white, middle class and Christian.

Community character is perceived to be that which makes the community distinctive from other communities. Changes to community character are frequently traumatic to community residents as demonstrated by the prevalence of “no growth” or “smart growth” movements dedicated to maintenance of the status quo. Public concerns regarding community character included concerns that low income or non-English speaking populations would be drawn to the area by casino jobs. Significant changes in community character arising from casino resort hiring are not expected; as a comparatively small number of out-of-area new hires are expected with residential settlement distributed over a large area. Community character is further addressed in **Section 4.13**.

Community values, meaning the extent to which people share the same ethical and religious beliefs and other goals and values is presented as an additional concern of the public. It should be noted that such goals and values tend to be shared by socioeconomic segments in the population. Comparison of the marketing demographic for the resort casino with the residential population for the greater La Center/Ridgefield area shows substantial similarities. In other words, the average casino customer is likely to be from the greater Portland area, be white, Christian and middle class. Accordingly, it would appear unlikely that this customer base would interject a different value structure into the local community. Thus, the anticipated effects to quality of life are less than significant. No mitigation is required.

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

DIRECT ECONOMIC EFFECTS

The direct economic effects for both construction and operation of Alternative B are similar to those described for Alternative A. These alternatives differ only in that NW 319th Street would not be rerouted under Alternative B; this does not affect the economic impact of the project.

SOCIAL EFFECTS, EFFECTS TO THE COWLITZ INDIAN TRIBE, COMMUNITY INFRASTRUCTURE

Social effects, effects to the Cowlitz Indian Tribe, and effects to community infrastructure are similar to those described for Alternative A. These alternatives differ only in that NW 319th Street would not be rerouted under Alternative B; this does not change the impact to social issues, the Cowlitz Indian Tribe, or community infrastructure.

4.7.3 ALTERNATIVE C – REDUCED INTENSITY

DIRECT ECONOMIC EFFECTS

Construction

Construction required for Alternative C would generate economic activity within Clark and Cowlitz counties. Direct impacts would primarily consist of expenditures to local construction and engineering firms necessary for construction of the project facilities. Construction impacts for Alternative C are summarized in **Table 4.7-1**. The estimated cost of construction for Alternative C is \$289,055,000. Approximately 2,272 jobs would be generated over the entire construction period with an average wage of \$46,200 and a total payroll of \$104,965,000 (E.D. Hovee, 2006a). It is estimated that all workers would come from the region due to limited duration of jobs and longer commute patterns for the construction industry. This would be a beneficial economic impact to the region. No mitigation is required.

Operation

Operational impacts for Alternative C are summarized in **Table 4.7-2**. Alternative C is expected to employ 2,156 employees with an average wage of \$28,000 and a total annual payroll of \$60,293,000 (E.D. Hovee, 2006a). The average wage of \$28,000 is discussed in comparison to the primary and secondary area under Alternative A in **Section 4.7.1**. The portion of employees who would already reside in Clark and Cowlitz counties is estimated at 90% (variable between 85-95%). The estimated amount of gaming revenue based on figures provided by Salishan-Mohegan, LLC for similar gaming facilities is \$244,109,000 per year. These numbers are high estimates because some of these receipts would be accounted for by the substitution effect. Operational revenues are a significant, beneficial impact to the economics of the region. No mitigation is required.

Impacts to Local Jurisdictions

As indicated for Alternative A, and further discussed in Taylor's 2005 study (DEIS Vol. III, **Appendix Z**), Alternative C would benefit not only Tribal members, but non-Indian community members as well. The public costs to local jurisdictions from patrons and guests include fire, police, problem gambling, and transportation costs, and are comparable to other commercial gaming facilities. These costs are addressed in the respective sections of this EIS including **Section 4.10** (Public Services), **Section 4.8** (Transportation/Circulation), and **Section 4.7** (Social Effects, below).

Local jurisdictions and agencies would receive one-time state sales tax revenues from construction purchases related to Alternative C. These funds would be collected by the local businesses and distributed by the State to the County as required by current Washington State law. These funds would total approximately \$22,257,000 (E.D. Hovee, 2006a).

Under Alternative C, land would be taken into trust and would no longer be subject to annual state and local property, sales, or hotel/motel taxes. If Alternative C were subject to these taxes, non-gaming sales tax would equal approximately \$5,451,000 and would be distributed among the State, County, and local criminal justice departments. Similarly, if subject to local property tax, property tax revenues from Alternative C would total approximately \$2,273,000 and would be distributed to local schools, the Fort Vancouver Regional Library, CCFD 12, the Port of Ridgefield, Clark County, and other entities. The estimated hotel/motel tax if Alternative C were subject to this tax would be approximately \$376,000, which would be distributed among the State, County, and local criminal justice departments. Within the hotel/motel tax estimates, the surcharge tax on hotel rooms for the Southwest Washington Convention and Visitor's Bureau is estimated to total approximately \$82,000. The total of these annual tax revenues would be approximately \$8,100,000.

The Tribe has committed in Section 11 of the MOU and Section 3(H) of the EPHS Ordinance to collect sales tax on non-Indian sales, to make payments in lieu of property taxes, and to make an annual payment equivalent to the hotel/motel or transient occupancy tax. As analyzed above this

amount would total approximately \$8,100,000. This would be a beneficial impact to the region. No mitigation is required.

Impacts to Surrounding Property Values

Impacts to property values would be similar to those described under Alternative A. Recent studies have found that there is no statistically discernable effect on property values in communities near reservations or casinos (Taylor, 2006; EcoNorthwest, 2006). Properties surrounding the project site may increase in value due to speculation for commercial growth. This is a beneficial impact. No mitigation is required.

Impacts to Existing Indian Casino Gaming Market

Impacts to existing Indian gaming facilities would be similar to those described under Alternative A and would be less than significant. No mitigation is required.

Impacts to Spirit Mountain

Competitive effects to the Spirit Mountain casino would be similar to those discussed under Alternative A. An analysis of Alternative A using a gaming model shows it is reasonable to believe that Alternative A could operate by 2011 without significantly affecting existing operations of gaming facilities serving the Southwest Washington and Northwest Oregon gaming market. (**Appendix L** of the FEIS). Due to the reduced size and reduced revenues under Alternative C, it is anticipated that competitive effects would be less than under Alternative A. Sources of future market growth include anticipated population and income growth, potential for increased wins per visit, and increased casino participation. This growth is consistent with gaming experience regionally and nationally. With increased competition, existing casinos will likely be placed in the position of needing to refine marketing and promotion programs aimed at retaining existing patrons. However, it is reasonable to believe that Alternative C could operate without negatively affecting existing operations of the existing Spirit Mountain facility.

Impacts to the City of La Center and the Port of Ridgefield

Impacts to the La Center card rooms would be similar to those described under Alternative A, although reduced in intensity. As Alternative C offers approximately two-thirds of the gaming positions offered by Alternative A or B, it could be assumed that Alternative C would have two-thirds of the effect of Alternative A on the La Center card rooms, or a 44% reduction in gambling tax revenue received by the City of La Center. A 44% decline in gaming tax revenues equates to an estimated \$2.1 million revenue loss to the City of La Center. However, \$2.6 million per year in continued gaming tax revenue would continue to be paid to the City. This is well in excess of the \$823,000 (or 25% of gambling tax revenues) allocated by the City to its general fund as of 2005 (E.D.

Hovee, 2006c). Some of the discretionary fund is used on capital improvement projects for public facilities and thus this impact is considered potentially significant.

As discussed for Alternative A, the Tribe has offered to enter into an agreement with La Center to address the replacement of taxes and fees, and to provide for funding of capital facilities projects and certain transportation improvements. The agreement could also address a joint marketing program with the City and existing card rooms. The City of La Center, in comments on the DEIS, responded to the proposal of the Cowlitz Indian Tribe, but no agreement has been reached.

Significant impacts are not expected for businesses located in the industrial park or undeveloped properties owned by the Port of Ridgefield. As the industrial park businesses serve different purposes than Alternative C, there would be little fiscal or employment effect. General substitution effects are discussed in **Section 4.14**, Indirect and Growth-Inducing. Increased business in the area from Alternative C is likely to increase values for undeveloped properties rather than decrease values. Thus, the effect to the Port of Ridgefield is expected to be less than significant.

SOCIAL EFFECTS, EFFECTS TO THE COWLITZ INDIAN TRIBE

Social effects and effects to the Cowlitz Indian Tribe would be similar to those described under Alternative A. The operation of gaming facilities would have a lesser effect on crime, bankruptcy, and problem and pathological gambling, than Alternative A. With regards to the Cowlitz Indian Tribe, Alternative C would provide revenues improving the socioeconomic status of the Tribe, although to a lesser extent than Alternatives A or B. Discounting the existence of threshold or synergistic effects, as Alternative C offers two-thirds of the gaming positions of Alternative A or B, it may be assumed that Alternative C would have two-thirds of the social and economic effects.

COMMUNITY INFRASTRUCTURE

Schools

Similar to Alternative A, if population increase occurred in the area, a likely effect would be increased school enrollment. Applying the rate of 0.46 students per household, for an anticipated 216 households moving into the “secondary area,” it is estimated that Alternative C would generate a maximum of 100 new students distributed throughout Clark and Cowlitz counties, which currently has 89,000 students and 144 schools (E.D. Hovee, 2006a).

Impacts to the Ridgefield School District are confined to an increase in the number of students generated by the new permanent employment. As noted in the socioeconomic study by E.D. Hovee (2006a) (DEIS Vol. II, **Appendix S**), the existing labor supply is sufficient for the proposed facility. Additionally, impacts to school enrollment are usually tied more directly to new housing than to employment. As the housing supply is more than adequate for any new employment, no significant

effects are expected. Additionally, the Tribe has agreed, as described in **Section 5.2.6**, pursuant to an MOU with the Ridgefield School District (DEIS Vol. III, **Appendix AA**), to pay school impact fees to the District if the Tribe constructs single- or multi-family residential housing on land within the District's service area. This would ensure that impacts remain less than significant.

Libraries and Parks

Effects to parks and libraries would be similar to those described under Alternative A and, therefore, less than significant. No mitigation is required.

Quality of Life

Effects to quality of life would be similar to those described for Alternative A and, therefore, less than significant. No mitigation is required.

4.7.4 ALTERNATIVE D – BUSINESS PARK

DIRECT ECONOMIC EFFECTS

Construction

Construction required for Alternative D would generate substantial economic activity within Clark and Cowlitz counties. Direct impacts would primarily consist of expenditures to local construction and engineering firms necessary for construction of the project facilities. Construction impacts for Alternative D are summarized in **Table 4.7-1**. The estimated cost of construction for Alternative D is \$127,145,000. Approximately 999 jobs would be generated over the entire construction period with an average wage of \$46,200 and a total payroll of \$46,170,000 (E.D. Hovee, 2006a). It is estimated that all workers would come from the region due to limited duration of jobs and longer commute patterns for the construction industry. This would be a beneficial economic impact to the region. No mitigation is required.

Operation

Operational impacts for Alternative D are summarized in **Table 4.7-2**. Alternative D is expected to employ 2,991 employees with an average wage of \$49,000 and a total annual payroll of \$146,605,000 (E.D. Hovee, 2006a). The number of employees that would already reside in Clark and Cowlitz counties depends on the businesses that occupy the business park, but is anticipated to be within range of the percentage given for the casino (E.D. Hovee, 2006a). Operational employment and revenues would be a significant, beneficial impact to the economics of the region. No mitigation is required.

Impacts to Local Jurisdictions

Local jurisdictions and agencies would receive one-time state sales tax revenues from construction purchases related to Alternative D. These funds would be collected by the local businesses and

distributed by the State to the County as required by current Washington State law. These funds would total approximately \$9,790,000 (E.D. Hovee, 2006a).

Under Alternative D, land would be taken into trust and would no longer be subject to annual state/local property tax or sales tax. If Alternative D were subject to these taxes, non-gaming sales tax would equal approximately \$2,468,000 and would be distributed among the State, County, and local criminal justice departments. Similarly, if subject to local property tax, property tax revenues from Alternative D would total approximately \$1,002,000 and would be distributed to local schools, the Fort Vancouver Regional Library, CCFD 12, the Port of Ridgefield, Clark County, and other entities. The total of these annual tax revenues would be approximately \$3,470,000. The Tribe has committed in both Section 11 of the MOU and Section 3(H) of the EPHS Ordinance to collect sales tax on non-Indian sales and to make payments in lieu of property taxes. As analyzed above these funds would be a beneficial impact to the region. No mitigation is required.

Impacts to Surrounding Property Values

Negative value impacts to nearby properties would not occur under Alternative D as the area is already designated for future urban/industrial development, including business park uses. Therefore, this impact is less than significant. No mitigation is required.

Impacts to Existing Indian Casino Gaming Market

As there would be no gaming under this alternative, there are no anticipated competitive effects to gaming facilities.

Impacts to the City of La Center and the Port of Ridgefield

As no new gaming venue would be provided, impacts to the City of La Center gaming tax revenue would be minimal or nonexistent. However, the new business center would be providing commercial space. Accordingly, it is possible that the competition effect would result in some reduction of space rental prices or increased vacancy rates. However, since the business center would have no advantages in competing with the Port of Ridgefield, and suffer from a number of disadvantages, detrimental effects to the Port of Ridgefield are unlikely.

SOCIAL EFFECTS

Under Alternative D there would be no social effects from gaming operations. Effects to law enforcement are discussed in **Section 4.10**, Public Services.

EFFECTS TO THE COWLITZ INDIAN TRIBE

The business park would benefit the Tribe individually and as a whole. It would generate new income to fund the Tribe's governmental programs. This income is anticipated to have a beneficial

effect on Tribal attitudes, expectations, quality of life, and culture by funding Tribal programs that serve Tribal members, including education, health care, housing, and social services, and by supporting Tribal self-sufficiency and self-determination. It would also provide a small number of Tribal members with opportunities for employment, which would not only allow some Tribal members to enjoy a better standard of living, but also would likely reduce welfare program payments to Tribal members. However, the higher educational and skill levels required for most business park jobs can be expected to reduce the number of Tribal members that are qualified. Acquisition of the property in trust and the proposed development would provide the Tribe with a land base from which to operate a stable Tribal Government and governmental programs, and to develop further governmental expertise.

However, under Alternatives A, B, C, and E, the Tribe would be operating with a basic competitive advantage; the Tribe's right to game on the property in accordance with IGRA in ways not allowed on non-Indian lands in the state of Washington. In operating a business park development, the Tribe would lose this advantage and would suffer from a number of disadvantages. The most significant disadvantages include difficulty in securing financing due to the restrictions against alienation that apply to trust property, and the Bureau of Indian Affairs (BIA) procedures for lease approvals, which would apply to all the business leases and subleases within the business park. These liabilities make implementation of a Tribal business park on trust land difficult. Additionally, the advantage of trust acquisition exclusion from local taxation is lost by the Tribe's agreement to reimburse these monies under the MOU with Clark County and EPHS Ordinance.

Business park jobs are expected to both provide higher median wages and require higher educational and job skill levels than jobs at a casino resort. While it is relatively easy to ensure Tribal preference in employment for a resort casino, it would be very difficult to secure Tribal employment preference in a business park development. A business park would be competing for renters with other available space having fewer restrictions, including tribal employment preference and BIA lease approval. Additionally, a business park is unlikely to provide the revenue stream to provide Tribal job training or employment assistance programs to its members, or be able to support Tribal offices and other programs. Accordingly, it may be expected that a business park would employ many fewer Tribal members than Alternatives A, B, C or E.

The revenue from Alternative D would consist mainly of rent collected from office and industrial space, which would bring in significantly less revenue for the Tribe than Alternatives A, B, C or E, thereby reducing the number and quality of programs the Tribe can provide for its members. Additionally, not all members of working age would benefit from jobs at the business park, as they would only be available to individuals with the skills and training necessary to qualify for the positions. The Tribe would not be able to require Tribal preference in employment and training while

leasing building space in a competitive arena. Accordingly, it is assumed that relatively few Tribal members would benefit from employment opportunities.

Finally, it is unknown if capital can be secured for construction of a business park. The Tribe has not pursued the investigation of capital availability; largely as Tribal ownership and management is usually considered an impediment to standard commercial loans and funds for a loan of this size are not available under the BIA loan guarantee program. Therefore, the reduced revenue and limited employment opportunities for Tribal members make it likely that this Alternative would not meet the economic needs of the Tribe.

COMMUNITY INFRASTRUCTURE

Schools

If population increase occurred in the area, a likely effect would be increased school enrollment. Applying the rate of 0.46 students per household, for an anticipated 299 households moving into the “secondary area,” it is estimated that Alternative D would generate a maximum of 138 new students distributed throughout Clark and Cowlitz counties, which currently has 89,000 students and 144 schools (E.D. Hovee, 2006a). Such an increase distributed over the secondary area would not be significant.

Impacts to the Ridgefield School District are confined to an increase in the number of students generated by the new permanent employment. As noted in the socioeconomic study (E.D. Hovee, 2006a) (DEIS Vol. II, **Appendix S**), the existing labor supply is sufficient for the proposed facility. Additionally, impacts to school enrollment are usually tied more directly to new housing than to employment. As the housing supply is more than adequate for any new employment, no significant effects are expected.

Libraries and Parks

Effects to area libraries and parks could occur if the employees of Alternative D significantly increase the demand on these resources. However, due to the limited number of employees that are expected to relocate to the project area, it is expected that these effects would be negligible. Therefore, impacts to libraries and parks would be less than significant.

Quality of Life

Quality of life is defined under the discussion of Alternative A. Significant changes in community character arising from Alternative D hiring practices are not expected; as a comparatively small number of out-of-area employees are expected with residential settlement distributed over a large area. Community character is further addressed in **Section 4.13**. The situation for the La Center Interchange Site is slightly complicated by the fact that the area is in transition, from a predominantly

rural blue-collar community to a white-collar bedroom community for the greater Portland metropolitan area. This shift is perceived by residents as being a small change in the ethnic, economic and religious character of the area; which is predominantly white, middle class and Christian. The anticipated effects to quality of life are less than significant. No mitigation is required.

4.7.5 ALTERNATIVE E – RIDGEFIELD INTERCHANGE SITE

DIRECT ECONOMIC EFFECTS

Construction

Construction required for Alternative E would generate economic activity within the City of Ridgefield, and Clark and Cowlitz counties. Direct impacts would primarily consist of expenditures to local construction and engineering firms necessary for construction of the project facilities. Construction impacts for Alternative E are summarized in **Table 4.7-1**. The estimated cost of construction for Alternative E is \$369,407,000. Approximately 2,904 jobs would be generated over the entire construction period with an average wage of \$46,200 and a total payroll of \$134,143,000 (E.D. Hovee, 2006a). It is estimated that all workers would come from the region due to limited duration of jobs and longer commute patterns for the construction industry. This would be a beneficial economic impact to the region. No mitigation is required.

Operation

Operational impacts for Alternative E are summarized in **Table 4.7-2**. Alternative E is expected to employ 3,095 employees with an average wage of \$28,000 and a total annual payroll of \$86,580,000 (E.D. Hovee, 2006a). The average wage of \$28,000 is discussed in comparison to the primary and secondary area under Alternative A, **Section 4.7.1** above. The portion of employees who would already reside in Clark and Cowlitz counties is estimated at 90% (variable between 85-95%). The estimated amount of gaming revenue, based on figures provided by Salishan-Mohegan LLC for similar gaming facilities, is \$437,202,000 per year. Operational revenues would be a significant, beneficial impact to the economics of the region. No mitigation is required.

Impacts to Local Jurisdictions

The public costs to local jurisdictions from patrons and guests include fire, police, problem gambling, and transportation costs, and are comparable to other commercial gaming facilities. These costs are addressed in the respective sections of this EIS including **Section 4.10** (Public Services), **Section 4.8** (Transportation/Circulation), and **Section 4.7** (Social Effects, below).

Local jurisdictions and agencies would receive one-time state sales tax revenues from construction purchases related to Alternative E. These funds would be collected by the local businesses and distributed by the State to the County, and City of Ridgefield as required by current Washington State law. These funds would total approximately \$28,444,000 (E.D. Hovee, 2006a).

Under Alternative E, land would be taken into trust and would no longer be subject to state and local property, sales, or hotel/motel taxes. If Alternative E were subject to these taxes, non-gaming sales tax would equal approximately \$8,093,000 and would be distributed among the State, County, City of Ridgefield, and local criminal justice departments. Similarly, if subject to local property tax, property tax revenues from Alternative E would total approximately \$2,680,000 and would be distributed to local schools, the Fort Vancouver Regional Library, CCFD 12, the Port of Ridgefield, the City of Ridgefield, Clark County, and other entities. The estimated hotel/motel tax if Alternative E were subject to this tax would be \$442,000, which would be distributed among the State, County, and local criminal justice departments. Within the hotel/motel tax estimate, the surcharge tax collected on hotel rooms for the Southwest Washington Convention and Visitor's Bureau would total \$123,000. The total of these annual tax revenues would be approximately \$11,338,000 (**Table 4.7-4**).

TABLE 4.7-4
ESTIMATED LOST ANNUAL TAX REVENUE

Property Tax	
Estimated future property value	\$480,903,000
Tax Rate / \$1,000 tax assessed value*	\$5.57335
Total	\$2,680,000
Sales Tax	
Estimated taxable annual sales (retail/food)	\$109,364,000
Tax Rate	7.4%
Total	\$8,093,000
Hotel/Motel Tax	
Total Revenue	\$4,688,000
Tax Rate	9.4%
Subtotal	\$442,000
SWWCVB hotel surcharge	\$123,000
Total (Hotel/Motel Tax + SWWCVB surcharge)	\$565,000
Total estimated annual tax	\$11,338,000

NOTES: Values rounded to nearest thousand.

*Tax Rate Components for 2007 (Subject to Annual Change) – Total \$5.57335 including County General, Local Schools, City of Ridgefield, Port of Ridgefield, Fire District 12, and Ft Vancouver Regional Library. SWWCVB = Southwest Washington Convention & Visitor's Bureau.

Source: E.D. Hovee, 2006a; AES, 2007.

The impact of lost revenues is considered significant and mitigation is provided in **Section 5.0**. With mitigation the impact would be reduced to a less than significant level and would result in beneficial impacts for local jurisdictions.

Impacts to Surrounding Property Values

Negative value impacts to nearby properties, including large rural homes situated near the Ridgefield Interchange Site, could occur to the extent they are affected by any noise, traffic, shadow, lights, or glare generated by this alternative. These effects to the rural nature of the property would generally be perceived as negatively affecting home values. However, recent studies have found that there is no statistically discernable effect on property values in communities near reservations or casinos (Taylor, 2006; EcoNorthwest, 2006). Additionally, it should be noted that proposed development in the Ridgefield Interchange area is predicted to change its rural character to more commercial and service economy directed land uses. Properties surrounding the alternative project site may increase in value due to speculation for commercial growth. This is a beneficial impact. No mitigation is required.

Impacts to Existing Indian Casino Gaming Market

Impacts to existing Indian gaming facilities would be similar to those described under Alternative A and would be less than significant. The shift in location to the Ridgefield Interchange Site should make no change in the ability of Alternative E to capture a share of the Portland Vancouver metropolitan area market as discussed above.

Impacts to Spirit Mountain

Competitive effects to the Spirit Mountain casino would be similar to those discussed under Alternative A. An analysis of Alternative A using a gaming model shows it is reasonable to believe that Alternative A could operate by 2011 without significantly affecting existing operations of gaming facilities serving the Southwest Washington and Northwest Oregon gaming market (**Appendix L** of the FEIS). Due to the similar size and expected revenues for Alternative E, it is anticipated that competitive effects would be substantially similar to those analyzed for Alternative A. Sources of future market growth include anticipated population and income growth, potential for increased wins per visit, and increased casino participation. This growth is consistent with gaming experience regionally and nationally. With increased competition, existing casinos will likely be placed in the position of needing to refine marketing and promotion programs aimed at retaining existing patrons. However, it is reasonable to believe that Alternative E could operate without negatively affecting existing operations of the existing Spirit Mountain facility.

Impacts to the City of La Center and the Port of Ridgefield

Impacts to the gaming revenues received by the City of La Center would be similar to those described under Alternative A. As reduced card room revenue may affect discretionary funding for capital improvement projects, this impact is considered potentially significant.

Significant impacts are not expected for businesses located in the industrial park or undeveloped properties owned by the Port of Ridgefield. As the industrial park businesses serve different purposes than Alternative E, there would be little fiscal or employment effect. General substitution effects are discussed in **Section 4.14**, Indirect and Growth Inducing. Increased business in the area from Alternative E is likely to increase values for undeveloped properties rather than decrease values. Thus, the effect to the Port of Ridgefield is expected to be less than significant.

SOCIAL EFFECTS AND EFFECTS TO THE COWLITZ INDIAN TRIBE

The facilities under this alternative would be substantially similar in use and square footage to those described for Alternative A. Therefore, social effects and effects to the Cowlitz Indian Tribe would be similar to those described under Alternative A. As discussed under Alternative A, impacts from bankruptcies associated with casino gaming would be less than significant. The estimated increase in problem gamblers seeking treatment would require one additional licensed counselor in Clark County at an approximate cost of \$47,500. Mitigation is listed in **Section 5.2.6** to contribute no less than \$50,000 per year to compensate these service programs. With this mitigation, effects to problem gambling services would be less than significant.

COMMUNITY INFRASTRUCTURE

Schools

If population increase occurred in the area, a likely effect would be increased school enrollment. Applying the rate of 0.46 students per household, for an anticipated 310 households moving into the “secondary area,” it is estimated that Alternative E would generate a maximum of 143 new students distributed throughout Clark and Cowlitz counties, which has 89,000 students and 144 schools (E.D. Hovee, 2006a). This effect is less than significant when distributed over the two counties.

Impacts to the Ridgefield School District are confined to an increase in the number of students generated by the new permanent employment. As noted in E.D. Hovee’s socioeconomic study (2006a) (DEIS Vol. II, **Appendix S**), the existing labor supply is sufficient for the proposed facility. Additionally, impacts to school enrollment are usually tied more directly to new housing than to employment. As the housing supply is more than adequate for any new employment, no significant effects are expected. Additionally, the Tribe has agreed, as described in **Section 5.0**, pursuant to an MOU with the Ridgefield School District (DEIS Vol. III, **Appendix AA**), to pay school impact fees to the District if the Tribe constructs single- or multi-family residential housing on land within the District’s service area. This would ensure that impacts remain less than significant.

Additionally, there are concerns that a gaming development at the Ridgefield Interchange Site would conflict with the proposed parochial school on N 65th Avenue. Land use compatibility is more thoroughly discussed in **Section 4.9**. Concerns that there will be increased crime in the area that

could affect students is presented in **Section 4.10** followed by the discussion that there is no definitive link between gambling and crime. Additionally, age requirements at the casino would restrict entrance and prevent illegal alcohol consumption by students. As discussed under quality of life, it would appear unlikely that the customer base would interject a different value structure into the local community. Other possible conflicting environmental impacts including, but not limited to, air quality, traffic, noise, are discussed throughout **Section 4.0**. There are no individual impacts after mitigation that would cause significant impacts to development of a parochial high school at the proposed school site.

Libraries and Parks

Similar to Alternative A, the limited number of employees that are expected to relocate to the project area would have a less than significant impact on library and park services. Additionally, due to the nature of Alternative E, it is not expected that many patrons would frequent local libraries or parks.

Quality of Life

Quality of life issues are similar to those discussed for Alternative A. Significant changes in community character arising from casino resort hiring are not expected; as a comparatively small number of out-of-area new hires are expected with residential settlement distributed over a large area. Community character is further addressed in **Section 4.13**. Community values, meaning the extent to which people share the same ethical and religious beliefs and other goals and values is presented as an additional concern of the public. It should be noted that such goals and values tend to be shared by socioeconomic segments in the population. Comparison of the marketing demographic for the resort casino with the residential population for the greater La Center/Ridgefield area shows substantial similarities. In other words, the average casino customer is likely to be from the greater Portland area, be white, Christian and middle class. Accordingly, it would appear unlikely that this customer base would interject a different value structure into the local community. Thus, the anticipated effects to quality of life are less than significant. No mitigation is required.

4.7.6 ALTERNATIVE F – NO ACTION

Under the No Action Alternative, the Tribe would be precluded from benefiting from an increased revenue stream associated with gaming or other commercial activities at the alternative project sites. In the near term, the residences on both sites would remain. In the future, the alternative project sites may be developed with industrial or commercial uses.

4.7.7 TRIBAL ISSUES

The Cowlitz Tribal Council has determined that acquisition of trust property is crucial to the governmental, cultural, and financial health of the Tribe and its people. Accordingly, the Council passed a resolution stating its intention and desire, on behalf of the Tribal members it represents, that

the La Center Interchange Site be taken into trust and proclaimed to be the Tribe's initial reservation. The Tribe's original fee-to-trust application for the property was submitted immediately upon publication of the BIA's final Tribal recognition determination in 2002, and the application has been updated on several occasions since then. In 2004, the Tribe agreed to settlement legislation entitled the "Cowlitz Indian Tribe Distribution of Judgment Funds Act" ("2004 Settlement Act"). The 2004 Settlement Act set forth a distribution plan for the Tribe's 1973 Indian Claims Commission (ICC) land claim award. The 2004 Settlement Act includes a provision setting aside a percentage of the settlement funds for acquisition of land, and the Tribe has resolved to use those funds to help pay for the La Center Interchange Site.

The revenue stream from the proposed casino-resort project would allow the Tribal Government to establish and/or fund a variety of governmental programs, including but not limited to:

- Tribal Administration;
- Tribal Housing;
- Employment Assistance, which would provide employment counseling and referrals for Tribal members;
- Educational Assistance for both adults and children providing pre-school opportunities and scholarships;
- Health Services, including urgent care, primary care, elder care, mental health programs and nutrition programs;
- Social Services, including general assistance, a food bank, childcare assistance, family counseling, adoption and foster care programs, alcohol and drug prevention programs, and seniors services.
- Cultural Resources Programs, including a museum and Tribal cultural center;
- Natural Resource and Environmental Protection Programs for the administration of Tribal lands;
- Economic Development;
- Law Enforcement Services;
- Tribal Court and Judicial Administrative Programs; and
- Municipal Services such as a roads program and water and sewer services.

Alternatives A, B, C and E, would provide the necessary revenue stream to establish the programs and benefits listed above.

4.7.8 ENVIRONMENTAL JUSTICE

According to the Council on Environmental Quality's (CEQ) *Environmental Justice Guidance under the National Environmental Policy Act*, low-income populations in an affected area should be

identified with the poverty thresholds from the Census Bureau. Minorities are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic Origin; or Hispanic. Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50% or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis.

A significant environmental justice effect would result if an action results in a disproportionately high adverse effect to minority and low-income populations, or if such an effect occurs with greater frequency for these populations than for the general population as a whole.

ALTERNATIVE A – PREFERRED CASINO-RESORT PROJECT

In order to determine whether a proposed action is likely to have disproportionately high and adverse effects, agencies must identify a geographic scale for which they will obtain demographic information. In this case, because perceived effects are likely to be socioeconomic and, therefore, present countywide, Clark County as a whole was selected. The State of Washington was examined for comparison.

Alternative A has the potential to result in the range of environmental effects described in **Sections 4.2 through 4.16** of this EIS. However, according to the U.S. Census, there are no low-income or minority populations residing within the affected area. Data shows higher household incomes and lower poverty rates than for the State as a whole. Therefore, the project would not result in environmental justice effects. No mitigation is required.

According to information received during the scoping period for this EIS, many of the employees of the La Center card rooms are members of ethnic minorities. As the losses to employment resulting from competition with an Indian casino would be felt most by this community, it could be argued that the project would result in disproportionate effects to ethnic minorities in the area. However, the new casino operation would also offer increased employment opportunities to all residents of Clark County, including employees of the card rooms, which would counterbalance any potentially negative effects on the card room employees. Moreover, the potential effect, to card room employees does not fall within the scope or intent of *Executive Order 12898*, which instructs Federal agencies to consider environmental justice effects prior to approving projects being proposed in low-income and minority areas. In this case, the project proponent is a minority and low-income community that is requesting Federal approval of the Proposed Project. The purpose and need for the Proposed Action is to facilitate the BIA's efforts to support economic development and self-sufficiency of the Tribe, thereby improving the overall economic conditions and quality of life of the Tribe and its members. As described above, the area is neither a low income nor a minority area.

In addition, even if this were a project that would have potential environmental justice impacts, under the National Environmental Policy Act (NEPA), the identification of a disproportionately high and adverse effect on a low-income or minority population does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmentally unsatisfactory. Rather, the identification of such an effect should heighten agency attention to alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community.

ALTERNATIVE B – PREFERRED PROJECT WITHOUT REROUTING NW 319TH STREET

Alternative B is similar to Alternative A, with the exception that NW 319th Street would not be rerouted. Refer to the description in **Section 4.7.1** for more detail.

ALTERNATIVE C – REDUCED INTENSITY

Potential effects under Alternative C are described in **Sections 4.2** through **4.16** of this EIS and would be similar to those identified for Alternative A. The potentially affected area would be the same. No significant environmental justice effects would result from this alternative as there are no low-income populations in the affected area and the minority community appears to be largely confined to employees of the La Center card rooms. This minority population of card room employees is neither a recognized residential population nor substantial in size. All of the geographic areas of measurement have higher household incomes, lower minority percentages, and lower poverty rates than the State as a whole. As with Alternatives A and B, this alternative would provide an overall economic boost to the Tribal community.

ALTERNATIVE D – BUSINESS PARK

As with all other project alternatives, environmental justice effects are not anticipated. The minority population that reportedly makes up the bulk of employees at the La Center card rooms is unlikely to be affected by implementation of the non-gaming alternative.

ALTERNATIVE E – RIDGEFIELD INTERCHANGE SITE

Environmental justice impacts for Alternative E are expected to be roughly comparable to the impacts for Alternatives A and B. Negative effects to resident minority or low income populations are not expected. Although decreased employment for minority employees at the La Center card rooms might result, increased employment opportunities at the new casino would balance the impact.

ALTERNATIVE F – NO ACTION

Under the No Action Alternative, none of the effects identified for the project alternatives would occur. The alternative project sites would continue to support existing land uses until such time as they are developed for other purposes.