

2.0 ALTERNATIVES

The proposed action is based on an application made by the Tribe to the Secretary of the Interior and BIA for a fee-to-trust transfer of 25 acres of land in the City of Cascade Locks, Oregon, for purposes of developing a casino and related entertainment facilities. This chapter describes the development of the range of alternatives and provides detailed descriptions of the alternatives evaluated in this EIS: the No Action Alternative; the proposed Cascade Locks Resort and Casino project (“proposed project”), which is the impetus of the proposed federal agency action; the Hood River Alternative; and the Warm Springs Alternative. It also describes alternatives that were previously considered but eliminated from detailed consideration because they are not reasonable or feasible, or because they would not adequately meet the purpose of and need for agency action. The chapter concludes with a comparison of the alternatives evaluated in the EIS.

2.1 Development of a Range of Alternatives

2.1.1 Proposed Casino Project

Since 1995, the Tribe has operated a 25,500-square-foot casino at Kah-Nee-Ta. In the late 1990s, the Tribe began investigating the possibility of establishing a new, larger gaming facility at a new location to increase tribal revenues to meet its governmental needs and promote tribal self-sufficiency. The Tribe would close the Kah-Nee-Ta casino when the new casino becomes operational to comply with state policy to authorize one casino per tribe, although the resort/hotel would remain open.¹ In 2002, the tribal membership voted to approve the Tribal Council’s pursuit of development of a casino on its traditional lands along the Columbia River (Tribal Council Resolution No. 10170 approved in referendum May 21, 2002).

The Tribe initially focused on developing a casino on a 40-acre parcel of tribal trust land on a wooded hillside overlooking the Columbia River east of Hood River, Oregon, which the Tribe asserts is eligible for a gaming facility. (More information concerning the Tribe’s ownership and access rights to the Hood River site is found in the description of the Hood River Alternative in Section 2.2.3) In considering the development of a casino on Hood River trust land, the Tribe examined the possibility of bringing additional Tribe-owned properties into trust (approximately 175 acres) to accommodate parking, wastewater, storm water, and water supply facilities that would support the casino. The Tribe conducted environmental and engineering studies of the Hood River site and BIA began preparation of an Environmental Assessment for that proposed fee-to-trust transfer; the Environmental Assessment was not completed.

As the Tribe moved forward with preparations to develop a casino on the Hood River trust land, the City of Hood River and others in the area expressed concerns about the location. In Resolution No. 824 (dated November 2, 1998), the Hood River County Board of Commissioners opposed the development of a casino in Hood River County, excluding the incorporated areas of the City of Hood River and the City of Cascade Locks. At that time (1998 and 1999), the community of Cascade Locks, Oregon, 17 miles to the west, approached the Tribe about the possibility of locating a gaming facility within the City of Cascade Locks. Cascade Locks, a former mill town with a shrinking economic base, was interested in the potential economic benefit that a casino would bring to the community. In 1999, the Tribe initiated discussions with

¹ The policy of Oregon’s Governors to date has been to authorize only one casino per tribe. There are nine federally recognized Indian tribes in Oregon, and all nine tribes operate gaming facilities.

Cascade Locks and the state regarding the development of a casino in Cascade Locks. The City of Cascade Locks, by Common Council Resolution No. 856 (dated June 28, 1999), and the Hood River County Board of Commissioners, in Resolution No. 1029 (dated June 4, 2001), supported development of a casino in Cascade Locks. Initially, the Tribe and the City were considering development of a casino on a peninsula on the Columbia River known as Government Rock, which is within the city limits and was under the ownership of the Port of Cascade Locks. The Tribe purchased Government Rock in April 2000.

In pursuing the possible development of a casino at the Government Rock site, discussions between the Tribe and the City of Cascade Locks led to the consideration of the mostly vacant Port of Cascade Locks Industrial Park as a location for the casino (Figure 2-1). The Tribe decided to initiate the process for requesting trust acquisition of 25 acres at the Port of Cascade Locks Industrial Park to develop a resort and casino.

The Cascade Locks site is within the area ceded by the Tribe to the United States in the Treaty of 1855. In accordance with the Treaty, the Tribe holds federally protected off-reservation fishing, hunting and gathering rights in this area. The Cascade Locks site is also within the area determined by the Indian Claims Commission in *Confederated Tribes of the Warm Springs Reservation of Oregon v. United States* (Docket No. 198) to be the Tribe's aboriginal lands exclusive of the claims of any other tribe or tribes.

The Tribe considers the Cascade Locks Resort and Casino a critical component of its plan to regain economic stability and invest in on-reservation ventures that provide employment and services to its members.

2.1.2 Alternatives Development

In August 2005, the BIA issued a Notice of Intent (NOI) to prepare an EIS for the proposed trust acquisition and resort and casino project in Cascade Locks (see Section 1.5). The NOI described the Tribe's proposed development and indicated the range of alternatives could be expanded in the EIS based on comments received through the scoping process.

Scoping comments included requests that the BIA examine alternative locations for the Tribe to develop a casino, including the Hood River trust land, Warm Springs Indian Reservation, Portland, and other Oregon locations. The BIA determined that a Hood River Alternative is reasonable and should be considered in this EIS. In a notice issued on December 1, 2005, the BIA extended the scoping period by 30 days to identify additional issues associated with that alternative.

Based on additional comments received from the BIA, the BIA decided to evaluate an on-reservation alternative in this EIS. Other alternatives identified during the scoping process were considered but eliminated from detailed consideration because they are not reasonable or feasible, or because they would not adequately meet the purpose of and need for agency action.

2.2 Alternatives Evaluated in this Environmental Impact Statement

2.2.1 No Action Alternative

Under the No Action Alternative, 25 acres of the Port of Cascade Locks Industrial Park property within the City of Cascade Locks would not be placed into federal trust for the benefit of the Tribe. Neither the 25-acre parcel nor the adjacent 35 acres of the Port's Industrial Park property would be developed as a resort and casino, and access to I-84 at Forest Lane would not be modified. Land use jurisdiction of the property would remain with the City of Cascade Locks.

This analysis assumes that the 60 acres of the Port's Industrial Park property (i.e., the land proposed for the resort and casino) would remain as-is in the near term. Much of the property has been vacant for more than 20 years, despite efforts by the City and Port of Cascade Locks to attract business. Future development of the site is constrained by access issues (i.e., no direct access to I-84 and an at-grade crossing of Union Pacific Railroad [UPRR] tracks), and is likely to remain so in the near future. Assuming that site zoning remains Heavy and Light Industrial, future development is likely to be consistent with the neighboring Bear Mountain Forest Products, i.e., a moderately sized industrial facility (100,000 square feet) with fewer than 100 employees and fewer than 10 truck ingress/egresses per day.

The Tribe would continue to seek ways to improve its revenues and would continue operations of the casino at Kah-Nee-Ta. A plausible outcome of the BIA's decision to take no action (i.e., if the BIA does not approve the fee-to-trust transfer) would be the Tribe's decision to utilize its trust and fee land east of Hood River. The fee land could be used in accordance with local zoning (e.g., harvested for timber or mined for gravel) or sold. Any such activity could require compliance with the Columbia River Gorge National Scenic Area Act. The trust land could also be used for timber harvest or gravel mining, or it could be developed for commercial use, such as a casino. Activities on trust land could require review and approval by the BIA, depending on the type of activity and involvement of third party users. Because the potential impacts associated with such a development merit detailed discussion, development of a casino at Hood River is treated in this EIS as a separate alternative (see Section 2.2.3).

2.2.2 Proposed Project: Cascade Locks Resort and Casino

The Tribe seeks a fee-to-trust transfer of approximately 25 acres for the development of gaming and related entertainment facilities. These 25 acres are part of a 120-acre tract of industrial lands located at the eastern edge of the City of Cascade Locks, within the Port of Cascade Locks Industrial Park. The fee-to-trust action requires review and approval in accordance with 25 CFR Part 151 and approval from the Secretary of the Interior in accordance with Section 20 of IGRA (two-part determination). In addition to the fee-to-trust parcel, the Tribe intends to lease approximately 35 acres of adjacent lands from the Port of Cascade Locks for ancillary facilities associated with the resort and casino (including parking, site drainage, and utilities connections). The Tribe also proposes to develop a design for a new interchange on I-84 at Forest Lane that complies with state and federal standards, and fund its construction.

The Port of Cascade Locks Industrial Park consists of relatively flat land on the eastern edge of Cascade Locks, within the city's urban growth boundary. It is approximately 42 miles east of Portland, Oregon. It is bounded by I-84 and the UPRR to the south; Herman Creek to the west; the Columbia River to the north, and Government Cove to the east (see Figure 2-2). The industrial park is bisected by Port Industrial Parkway and is accessible by Forest Lane. The proposed Cascade Locks Resort and Casino would be within the industrial park, just north of the UPRR and east of Bear Mountain Forest Products, a lease-holder within the industrial park.

2.2.2.1 Ability to Address Economic Need

Financial projections for the Cascade Locks Resort and Casino Project and alternatives were developed for the Tribe by ECONorthwest in January 2006 (Appendix B). The financial model used by ECONorthwest considered the market potential of the proposed facilities and the size and type of facilities to be developed, including construction and operating costs. Note that the financial projections are estimates only and do not represent guaranteed income to the Tribe.

The financial projections indicate that, in its first full year of operation (2009), the Cascade Locks Resort and Casino would be able to generate approximately \$3 million in discretionary distributions for the Tribe. The discretionary distributions are those funds that are available after operating expenses, debt service and short-term interest expenses, Community Benefit Fund contributions, and Tribe-Oregon Benefit Fund contributions are paid. Discretionary distributions represent the maximum amount of cash flow that could be withdrawn by the Tribe for tribal needs while still allowing for continuing resort and casino operations, repairs, maintenance, refurbishments, and capital replacements.

Discretionary distributions would increase over time. By 2011, the financial forecast for the Cascade Locks Resort and Casino indicates the discretionary distributions for the Tribe would be approximately \$29.1 million, increasing to \$139.5 million in 2014. Based on the 11-year projection period (2008 to 2018), average annual discretionary distributions to the Tribe would be approximately \$77 million. These forecasts indicate that the Cascade Locks Resort and Casino would allow the Tribe to meet its tribal government needs (approximately \$26 million per year) by 2011 and, in following years, to provide financial resources to allow existing tribal enterprises to expand and new ventures to be developed. Any subsequent development would be subject to appropriate land use and environmental review and permitting.

2.2.2.2 Tribal-State Compact

The Tribal-State Compact signed by the Tribe and the Governor of Oregon on April 6, 2005, is contingent on the fee-to-trust transfer of the 25-acre parcel in the City of Cascade Locks. The compact includes provisions for preserving the Tribe's Hood River trust and fee lands. Under the compact, the Tribe agrees to:

- Convey to the State a perpetual conservation easement over the Tribe's Hood River trust land (47.5 acres) to prevent gaming or other future development of that land (except for limited recreational development);
- Grant to the State a perpetual conservation easement over the Tribe's Hood River fee lands (175 acres) and transfer ownership interest of those fee lands to the State of Oregon, through the Oregon Parks and Recreation Department, to the greatest extent legally permissible; and
- Convey to the State a perpetual road easement to settle the parties' dispute regarding title to the Historic Columbia River Highway.

The compact also describes the Tribe's agreements with the state to meet state health, safety, and environmental standards; address transportation issues; meet state standards for employment and public accommodations; share a portion of its revenues from the gaming facility with a state-tribal established non-profit foundation (the Warm Springs Tribes - Oregon Benefit Fund [the "Tribe-Oregon Benefit Fund"]); and establish a Community Benefit Fund. The amount of revenue share to the Tribe-Oregon Benefit Fund would be based on the amount of

Net Win.² For the first seven years, the revenue share would range from 6 to 17 percent of Net Win (depending on the amount of Net Win). In the eighth year and beyond, the revenue share would be a constant 17 percent of Net Win. The Tribe's annual contributions to the Community Benefit Fund would be 6 percent of the facilities' net income.³ Assets from the Benefit Fund would be used to benefit the public primarily in Hood River, Wasco, Jefferson, Sherman, Gilliam, Wheeler, Deschutes, Crook, Clackamas, Multnomah, and Washington counties. Under the terms of a March 25, 2005, Memorandum of Understanding among the Tribe, the City of Cascade Locks, and the County of Hood River, the Tribe has obligated itself to pledge funds from the Community Benefit Fund for law enforcement, fire and emergency services, and traffic mitigation, among other benefits.

In addition to meeting its obligations under the Compact, improving the Tribe's long-term economic condition and supporting its self-sufficiency (see Section 1.3), the Tribe has set the following goals for the Cascade Locks Resort and Casino project:

- Avoid or minimize adverse impacts to the Columbia River Gorge National Scenic Area, natural and cultural resources, and the local community.
- Create a project consistent with National Scenic Area requirements for development in designated urban areas.
- Enhance economic development opportunities for the City of Cascade Locks and throughout the Columbia River Gorge in Washington and Oregon.
- Preserve and protect the Tribe's Hood River Trust Land and Hood River Fee Lands for scenic use within the Columbia River Gorge National Scenic Area.
- Provide opportunities to enhance funding of educational services and other services focused on public health and welfare in the State of Oregon.
- Improve the function, operations, safety and efficiency of I-84 and the local road network.

2.2.2.3 *Facilities*

Initial plans for the destination resort and casino include an approximately 90,000-square-foot gaming casino, 250-room hotel, meeting and convention facility, spa and fitness center, retail shops, cultural and interpretive center, child program center (short-term daycare facility), and a variety of dining options. Parking would be provided for approximately 3,700 vehicles in a 3-story garage and in surface lots (Figures 2-3 and 2-4). Operation of the proposed resort and casino would require a staff of approximately 1,700. Grading is expected to be balanced across the 60-acre site.

² For any period, the total amount wagered on Class III Gaming, less total amounts paid out for all customer Class III gaming winnings.

³ The amount of total net income that would be indicated on the audited financial statement for the gaming complex (i.e., casino, restaurants, hotel, and other ancillary facilities).

Resort and Casino Building

The resort and casino building would be located entirely on the 25-acre fee-to-trust parcel. The proposed building has a gross footprint of 221,364 square feet and the gross building area is approximately 585,000 square feet (not including parking).

In constructing the building, the Tribe intends to use wood that is certified by the Forest Stewardship Council as coming from sustainable, diverse forests and harvested using environmentally responsible methods. The Tribe plans to use 10 percent recycled materials and 100 percent recycled steel in building the facility.

The gaming component of the facility would consist of approximately 2,000 video lottery terminal (VLT) machines, 70 table games, an off-track betting parlor, Keno made available through runners and kiosks, and a 12-table poker room. The facility would provide a total of 2,622 gaming positions.

Nongaming facilities would include several dining areas: a 90-seat fine dining restaurant, 300- to 330-seat buffet, coffee bar, 250- to 300-seat jazz/blues club, 170- to 200-seat microbrewery, 50-seat snack bar, 50-seat lobby/lounge bar, two 12-seat bars, and a 30-seat bar⁴.

Other programmed spaces include retail shops, an exhibit hall and open area containing small craft and art vendors, a tribal culture and history interpretive center, an arcade, and a child program center. The child center would be a commercial, secure, short-term care center for children 12 and younger of resort and casino guests.

The five-story luxury hotel, contained within the resort and casino building, would have conference center space for guests of the hotel. A spa, fitness center, sauna/steam rooms, and an indoor/outdoor swimming pool would also be incorporated into the facility.

Parking Facilities

Parking would be provided for 3,718 visitor vehicles in two surface lots and one multitiered parking structure/garage, covering a total footprint of 992,000 square feet (22.77 acres). With the exception of a portion of the parking garage, most of the parking facilities would be located on land leased from the Port of Cascade Locks. One surface parking lot would be located to the north of the resort and casino building (north surface parking lot) and the other surface parking lot would be located west of the resort and casino building (west surface parking lot). The north surface parking lot would consist of 248 vehicle parking spaces on 3.32 acres (144,000 square feet) and the west surface parking lot would consist of 1,312 vehicle parking spaces (1,237 cars, 41 RVs, and 34 semi-trucks) on 14.26 acres (620,000 square feet). The majority of both parking lots would be constructed using asphalt or concrete, with landscaping and vegetated swales between paved surfaces.

The multitiered parking structure would be located immediately adjacent to and south of the resort and casino building. This parking structure would be designed to accommodate 2,158 vehicles. It would consist of one tier below grade, one tier at grade, and a top tier on the same level as the main floor of the resort and casino building. The footprint of the structure would cover 5.24 acres (228,000 square feet). The structure would be constructed of concrete.

⁴ Please note that all dining venues are still being designed and seating capacities could change; additional venues may be added.

Maintenance Building

The proposed facilities include a maintenance building, which would be located in the southern portion of the west parking lot. The building would be used to store maintenance equipment and supplies for support of the resort and casino, and would include office space for maintenance supervisors and a lunch room for landscape maintenance employees. There would be a fenced storage area adjacent to the building to secure materials and equipment, fuel storage, and vehicle maintenance and wash facilities. Initially, the maintenance building would be 10,000 square feet but could be expanded up to 20,000 square feet if more storage space is required.

Signage and Lighting

The proposed project would employ promotional signage on the I-84 corridor to attract visitors. Signage would be similar to existing commercial signage in the I-84 corridor in terms of size, height, and illumination. Signs within the Columbia River Gorge National Scenic Area would meet the requirements of the Management Plan for the scenic area. The Tribe intends to limit signs and lighting at the project site, using what is needed to guide visitors to the facility. The Tribe has agreed that signs and lighting at the casino would be in accordance with the same laws, ordinances, and codes that apply to any comparable commercial structure within the I-84 corridor and the City of Cascade Locks.

Main sources of light that would result from the proposed project include lighting from the parking lot (for safety and security), lighting of the building exterior elevations facing public spaces (such as entrances), and car headlights. For the safety of patrons, visitors, and employees, roads, parking areas, and pedestrian walkways would be lit. The lighting elements would be strong enough to provide a safe environment at the ground surface. Vehicular areas (parking lots and roadways) would have pole-mounted lighting; walkways, stairs, and paths would have either pedestrian-scale height poles or light bollards. The facility would use shielded fixtures and full cut-off luminaires (i.e., light fixtures that emit no light above the level of the fixture) approved by the International Dark Sky Association⁵ to minimize lighting impacts to the surrounding vicinity.

Storm Water

Storm water from the proposed facilities would be managed through a series of treatment systems, including rain gardens, swales, filters, and treatment ponds. The Tribe plans to use treated on-site rainwater to provide drip irrigation for on-site landscaping, reducing runoff. A detailed description of the proposed system is provided in Appendix C.

Facility Heating and Cooling

Facility heat would be provided by three 12,555,000-British thermal unit (BTU) natural gas or propane boilers, and facility hot water would be provided by four 1,500,000-BTU natural gas or propane water heaters. Two 2,000 kilowatt (kW) diesel generators are planned for the site and would be used for standby and peak shaving. All of the equipment would be located next to or

⁵ The International Dark Sky Association (IDA) is a nonprofit organization whose mission is to preserve and protect the nighttime environment and dark skies through quality outdoor lighting. The IDA provides a light fixture certification program for "Dark Sky Friendly" fixtures that reduce glare and light emissions to the nighttime skies.

inside the resort and casino facility. Facility cooling will be provided by three centrifugal water chillers.

Electric Service

The Cascade Locks Resort and Casino project is estimated to require approximately 4.5 to 5.5 megawatts (MW) of electricity. The existing City of Cascade Locks substation has the capacity to provide 6 MW of electricity, and currently provides 4.6 MW to the City's customers. The City plans to expand its existing substation and add transformers to provide a minimum capacity of 12 MW, which would accommodate the existing demand, resort and casino demand, and long-term growth projections for the community. The expansion of the existing substation, which is on a 50-foot by 80-foot parcel north of I-84 and south of the Port of Cascade Locks Industrial Park, would require an additional area of approximately 0.6 acres. The City is also considering relocating the substation to a site on the Port of Cascade Locks Industrial Park property, which would be west of the proposed project's west parking lot.

Telephone Service

The Cascade Locks Resort and Casino would require telephone service for approximately 2,000 units, with the capability to have 1,500 units in use and 500 units in reserve. The telephone service provider for the city (Sprint) anticipates installing a fiber optic line with a DS3 high speed service.

Potable Water Supply

The estimated average water requirements of the project facilities are 155,000 gallons per day in the winter and 400,000 gallons per day in the summer. The City of Cascade Locks would provide potable water service to meet those needs using existing water supply facilities. The City's wells provide capacity of 3.04 million gallons per day, of which 380,000 gallons are used.

Fire Suppression

The City water system would supply source water for the proposed on-site fire water storage reservoir via 2,500 feet of 12-inch pipe. The proposed reservoir is a one-million-gallon water storage tank that would be sited near the maintenance building, near the southwest corner of the west parking lot. It would provide 3,000 gallons per minute of water for fire suppression for up to four hours. A fire pump station would be sited adjacent to the storage tank with redundant fire delivery pumps. Water lines for the fire suppression system would consist of 5,200 feet of 16-inch pipe and 1,900 feet of 12-inch pipe.

Sanitary Sewer

The proposed project is expected to generate wastewater at a rate of approximately 155,000 gallons per day in the winter and 165,000 gallons per day in the summer. Wastewater would be conveyed from the resort and casino to the City's wastewater treatment plant, which has a design capacity for 480,000 gallons per day and currently treats 100,000 gallons per day. The sewage collection system would require installation of 12- and 10-inch gravity pipelines from Forest Lane to the north side of the resort and casino building, with a 6-inch gravity pipeline connection to the maintenance building near the west parking lot.

The existing sewage pump station located east of the Port Industrial Parkway/Forest Lane intersection and south of the UPRR corridor would be relocated on-site and rebuilt to increase capacity. The new pump station would discharge to the existing 8-inch pressure main in Forest Lane that conveys sewage to the gravity collection system and ultimately to the City's sewage treatment plant.

2.2.2.4 Transportation Improvements

To provide adequate vehicular access to the proposed resort and casino, as well as improve access to the Port of Cascade Locks Industrial Park, the Tribe proposes to finance construction of a full interchange with I-84 at the approximate location of the existing Forest Lane overpass.

To meet state standards for spacing of interstate freeway interchanges, closures of the Herman Creek Interchange ramps and the westbound off-ramp at the East Cascades Locks Interchange are proposed in conjunction with constructing a new interchange at Forest Lane.

Improvements to I-84 and local roads in the immediate vicinity of the new interchange are also proposed to ensure safe traffic movements and accommodate anticipated traffic volumes.

This section describes these proposed transportation improvements, collectively referred to as the "operationally-acceptable alternative" for interchange access improvements. It also summarizes the process by which these improvements were identified and included as part of the proposed Cascade Locks Resort and Casino project. More detailed information is provided in Appendix D.

Access Point Decision Report

As a modification to the existing Interstate Highway System, the proposed I-84 interchange at Forest Lane requires review and approval from the Federal Highway Administration (FHWA). Under FHWA policy, documentation of the need for new or revised interstate highway access must be provided through an Access Point Decision Report (APDR) that addresses the following eight policy points:

1. The existing interchanges and/or local roads and streets in the corridor can neither provide the necessary access nor be improved to satisfactorily accommodate the design-year traffic demands, while at the same time providing the access intended by the proposal.
2. All reasonable alternatives for design options, location, and transportation system management type improvements have been assessed and provided for if currently justified, or provisions are included for accommodating such facilities if a future need is identified.
3. The proposed access point does not have a significant adverse impact on the safety and operation of the interstate facility based on an analysis of current and future traffic.
4. The proposed access connects to a public road only and will provide for all traffic movements.
5. The proposal considers and is consistent with local and regional land use and transportation plans.

6. In areas where the potential exists for future multiple interchange additions, all requests for new or revised access are supported by a comprehensive interstate network study with recommendations that address all proposed and desired access within the context of a long-term plan.
7. The request for a new or revised access generated by new or expanded development demonstrates appropriate coordination between the development and related or otherwise required transportation system improvements.
8. The request for new or revised access contains information relative to the planning requirements and the status of the environmental processing of the proposal (63 Federal Register 7045-47) (FHWA, 1998).

An APDR has been prepared in consultation with FHWA, ODOT, and local governments to address these eight policy points (HDR, 2007). (A summary of the APDR is provided in Appendix D. The complete APDR is included in the project analysis file.) As part of the APDR process, a range of potential interchange alternatives was identified and screened to select an “operationally-acceptable alternative” (i.e., specific to the transportation improvements) to carry forward for full evaluation in the EIS. The operationally-acceptable alternative has been identified as the access alternative that addresses and is consistent with FHWA’s eight policy points, and does not adversely affect the safety and operations of the mainline freeway.

The operationally-acceptable alternative consists of the following elements:

- New I-84 interchange at Forest Lane;
- Closures of existing Herman Creek Interchange ramps and the westbound off-ramp at the East Cascade Locks Interchange;
- Variances from ODOT spacing standards for interstate freeway interchanges to retain the existing West Cascade Locks and Wyeth interchanges.
- Improvements to I-84, including a new auxiliary lane eastbound between the existing East Cascade Locks and new Forest Lane interchanges; and
- Local roadway improvements.

Following completion of a Final EIS, FHWA will issue a Record of Decision concerning the proposed Forest Lane Interchange and associated ramp closures. The APDR serves as the basis for FHWA’s decision.

Forest Lane Interchange

A new interchange with I-84 would be constructed at Forest Lane as a full directional “diamond” configuration interchange with direct connectivity from I-84 to Forest Lane and Frontage Road within the city limits of Cascade Locks (Figure 2-3). The I-84 overpass structure would accommodate three vehicle traffic lanes, plus turning lanes, with room on each shoulder for bike lanes and pedestrian sidewalks. The existing Forest Lane overpass would be removed. The I-84 ramp termini on Forest Lane would be controlled with traffic signals to accommodate anticipated traffic volumes.

The configuration of the Forest Lane Interchange is subject to Oregon Highway Plan (OHP; ODOT, 1999) policies and standards for local street access in the vicinity of interchanges. These are known as Division 51 standards (OAR 734-051-0010 through 734-051-0560). The Division 51 standards require a minimum distance of 1,320 feet between the interchange ramp

termini and the next closest crossroad on Forest Lane. As part of the APDR process, several design options were analyzed for the Forest Lane Interchange to meet, or approach meeting, this Division 51 standard. While several design options would be operationally acceptable, the configuration in Figure 2-3 has been identified as best meeting ODOT design standards and transportation needs of Cascade Locks.⁶

Interchange Ramp Closures

Construction of a Forest Lane Interchange would require closure of ramps at adjacent partial interchanges in order to meet FHWA and OHP spacing standards for interstate highways. The OHP spacing standard between interstate freeway interchanges is 3.0 miles in urban areas and 6.0 miles in rural areas. The Forest Lane Interchange would be 2.71 miles east of the West Cascade Locks Interchange, 1.32 miles east of the East Cascade Locks Interchange, and 0.88 miles west of the Herman Creek Interchange, all of which are in the urban area of Cascade Locks; and 4.64 miles west of the Wyeth Interchange, which is in a rural area.

Through the APDR process, it was determined that, because of the great deviation from spacing standards, closure of the Herman Creek Interchange ramps and the westbound off-ramp at the East Cascade Locks Interchange would be needed to avoid adverse effects to the safety and operation of I-84. The I-84 on- and off-ramps associated with the Herman Creek Interchange would be permanently closed and decommissioned. The westbound I-84 off-ramp at the East Cascade Locks Interchange also would be permanently closed and decommissioned (Figure 2-5). Traffic currently using the Herman Creek Interchange and the East Cascade Locks Interchange westbound off-ramp would use the new Forest Lane Interchange. The proposed improvements at the new Forest Lane Interchange would be expected to accommodate the traffic diverted from the closed ramps. The East Cascade Locks Interchange eastbound on- and off-ramps for the ODOT Port-of-Entry weigh station would remain open to allow continued use of the weigh station.

Because the deviation from spacing standards would be minimal, variances would be sought for the existing West Cascade Locks and Wyeth interchanges and for the I-84 eastbound on- and off-ramps for the Port-of-Entry weigh station at the East Cascade Locks Interchange. The process for obtaining a variance from OHP interchange spacing standards is described in Appendix D.

I-84 Improvements

An auxiliary lane would be constructed on I-84 to add one additional eastbound vehicle lane on I-84 from the eastbound on-ramp at the East Cascade Locks Interchange, to the eastbound off-ramp at the new Forest Lane Interchange (Figure 2-5). The purpose of the auxiliary lane would be to provide appropriate space for trucks entering I-84 from the Port of Entry weigh station and vehicles exiting I-84 at the Forest Lane Interchange to merge with and diverge from traffic on the I-84 mainline. The auxiliary lane would be approximately 0.8 miles long. It would extend the existing roadbed of I-84 to the south an average of 14-feet over this 0.8-mile segment to accommodate one 12-foot vehicle lane, stabilized shoulder, and guardrail clearance.

⁶ Final design will be determined as part of the Interchange Area Management Plan (IAMP) development process in consultation with property owners and the Cascade Locks community.

The I-84 bridge over Herman Creek would require widening on both its north and south sides to accommodate the westbound ramp onto I-84 from Forest Lane and the eastbound auxiliary lane. The design would include placement of new intermediate bents⁷ in Herman Creek: two on the north side of the bridge and two on the south side of the bridge. Each new bent would be in alignment with the existing bents in Herman Creek.

Local Roadway Improvements

Forest Lane would be widened along a 1,400-foot segment west of the new I-84 interchange to include up to four vehicular traffic lanes. A path for bikes and pedestrians also would be provided.

Access to the Port of Cascade Locks Industrial Park and the resort and casino property would be via a loop road that intersects with Forest Lane approximately 940 feet west of the Port Industrial Parkway/Forest Lane intersection and 1,287 feet west of the proposed I-84 westbound on- and off-ramps. The loop road, situated south of Forest Lane, gradually climbs to cross over Forest Lane (23-foot clearance) and the UPRR (24-foot clearance), and connects with Port Industrial Parkway. All improvements would be within the urban growth boundary and city limits of Cascade Locks. A variance would be sought for the minor deviation from spacing standards needed to avoid environmental impacts to Herman Creek.

Connection to Frontage Road on the south side of the overpass structure would be accomplished by relocating Frontage Road south of its current alignment and constructing a new roadway from the overpass to connect to the new alignment. The intersection of Forest Lane and Frontage Road would be 1,326 feet west of the proposed I-84 eastbound on- and off-ramps.

2.2.3 Hood River Alternative

The Tribe asserts the right under the IGRA to conduct Class III gaming on land in Hood River County, Oregon, that was taken into trust by the United States for the benefit of the Tribe before 1988, and is within the Tribe's Ceded Lands and aboriginal title lands. The trust land is a portion of an 80-acre trust allotment that was granted to an individual Indian in 1923, and which the Tribe acquired in 1974. The Hood River trust land is located outside the City of Hood River, within the Columbia River Gorge National Scenic Area on a wooded hillside overlooking the Columbia River (Figure 2-6). It is approximately 65 miles from Portland, Oregon. Because the land was held in trust prior to 1988, development of a gaming facility on the Hood River trust land would not be subject to Section 20 of IGRA and, therefore, could be developed as a casino without a two-part determination from the Secretary of the Interior or concurrence from the Governor of Oregon. The Governor, however, would be required to negotiate a Compact with the Tribe for the Tribe to conduct Class III gaming on the Hood River trust land. Development of a casino on the trust land would be consistent with the May 21, 2002 tribal membership referendum vote directing the Tribe to pursue the establishment of a casino on tribal trust lands in the Columbia River Gorge.

The Tribe is considering two options for development of the Hood River Alternative:

⁷ A substructure unit supporting each end of a bridge span (also called a pier), made up of two or more columns or column-like members.

Option A would involve development of a casino building and ancillary facilities, including parking, storm water treatment, water supply, and wastewater facilities, on a 40-acre parcel of the Hood River trust land (Figure 2-7).

Option B would involve development of a casino building on a 40-acre parcel of the Hood River trust land similar to Option A, but would make use of six parcels (totaling approximately 175 acres) that are next to or near the trust land for the development of ancillary facilities to the casino, including parking, storm water treatment, water supply, and wastewater facilities (Figure 2-8). These six parcels are currently owned in fee by the Tribe and are identified in three large tracts according to the names of previous owners: the Houston Property, Christian Futures Property, and Bryant Property. To develop these adjacent parcels with ancillary facilities to the casino, the Tribe would seek a fee-to-trust transfer in accordance with the trust acquisition regulations in 25 CFR Part 151. However, the Tribe would not be required to seek approval under Section 20 of IGRA or the Governor's concurrence because the fee-to-trust parcels would be developed with ancillary facilities rather than gaming.

Under both options, the casino building would be accessed along a newly constructed road that would connect with the Historic Columbia River Highway approximately 450 feet east of its intersection with OR 35. The casino access road would roughly parallel the Historic Columbia River Highway, crossing over it at one point (see Figures 2-7 and 2-8)⁸.

2.2.3.1 Ability to Address Economic Need

The casino facilities associated with the Hood River Alternative would be smaller than the Cascade Locks proposal, resulting in lower financial projections.

Option A. The financial projections indicate that, in the first five full years of operation (2009-2013), Option A would not generate sufficient revenues to provide any discretionary distributions for the Tribe (Appendix B). The first year in which discretionary distributions are forecast for this option is 2014, and the amount of the discretionary distributions for the Tribe in that year would be approximately \$39.7 million (Appendix B). Based on the 11-year projection period (2008 to 2018), the average annual discretionary distributions to the Tribe would be approximately \$30 million. These forecasts indicate that Option A of the Hood River Alternative would allow the Tribe to meet its tribal government needs by 2014 and in following years provide financial resources to allow existing tribal enterprises to expand and new ventures to be developed.

Option B. Financial projections indicate that Option B would not generate sufficient revenues to provide discretionary distributions for the Tribe until 2013, when the amount would be approximately \$12.9 million (Appendix B). In 2014, the discretionary distributions are forecast to be approximately \$85.1 million (Appendix B). Based on the 11-year projection period (2008 to 2018), the average annual discretionary distributions to the Tribe would be approximately \$38 million. These forecasts indicate that Option B would allow the Tribe to meet its tribal government needs by 2014, and in following years provide financial resources to allow existing tribal enterprises to expand and new ventures to be developed.

⁸ The proposed access road in Figures 2-6 and 2-7 is a potential configuration that was proposed by the Tribe as a feasible route, but is not the only feasible route that could be selected or negotiated with the state.

Note that the financial projections are estimates only and do not represent guaranteed income to the Tribe. Note also that the financial projections assume the Tribe would contribute to a Tribe-Oregon Benefit Fund and a Community Benefit Fund using the same payment system as described for the Cascade Locks Resort and Casino Project (see Section 2.2.2.2), although the Tribe has not committed to such contributions.

2.2.3.2 Access to Trust Land

The Tribe claims ownership of the portion of the Historic Columbia River Highway that passes through the Hood River trust land (a claim disputed by the State of Oregon) and a reserved right to access the trust land. These claims arise from the ownership history of the trust land.

In 1923, an 80-acre parcel of land (that is now known as the trust land) was granted to an individual Indian, Thomas Jim, without an express exclusion for a right of way. In the same general time period, the State claims (and the Tribe disputes) that it acquired an easement for 3.5 acres through the parcel to develop a scenic highway. In 1928, the State acquired 28.6 acres of the trust land to provide buffer strips on both sides of the scenic highway. The deed conveying the buffer strips includes a reserved right for the Indian owner to cross the southern buffer strip to access the highway from the trust land. The Tribe acquired the trust land from the heirs of Thomas Jim in the period from 1974 to 1976.

When the Tribe pursued development of a casino on the Hood River trust land beginning in the late 1990s, it considered accessing the proposed casino site from the Historic Columbia River Highway using its reserved right to cross the southern buffer strip. During discussions with representatives of various State departments, an alternative route was developed by tribal consulting engineers to address State concerns about impacts to the Mark O. Hatfield Trailhead site. The alternative route, which would cross State lands but lessen impacts to the trailhead, generally parallels the Historic Columbia River Highway and minimizes use of the highway.

2.2.3.3 Facilities

The Hood River Alternative (both options) would be smaller than the Cascade Locks proposal, and would consist of a casino building with restaurant and entertainment facilities, administrative office space, and parking. There would be no hotel, meeting and convention facility, or spa and fitness center, or other entertainment venues. Operation of the proposed casino would require a staff of approximately 750.

Option A facilities related to water supply, wastewater treatment, and storm water treatment would be contained on trust land. Other than the casino access road, there would be no development related to the casino off the trust land.

Option B would require development of water supply, wastewater treatment, and storm water treatment facilities on the fee-to-trust parcels.

Casino Building

The proposed casino building for both Options A and B would be a semicircular eight-story structure. This structure would be located on a 12-acre site with an additional 3.0 acres of cleared slope areas (Figure 2-9). The building would be set into the hillside, and would require excavation and removal of approximately 1.5 million cubic yards of material for Option A or 1 million cubic yards for Option B. The excavated material would need to be hauled to an off-site location.

The bottom six stories of the building would serve as parking (70,800 square feet on each level) and the top two floors would house gaming and entertainment facilities. The top (8th) floor of the building would be the main gaming level and would also include lobby and administration facilities. The 8th floor lobby, gaming floor, and maintenance facilities would encompass 63,480 square feet and 11,520 square feet would be reserved for administration offices. The 8th floor gaming area would accommodate 1,000 patrons and would include 1,000 VLT machines, 55 table games, and 8 poker tables. The facility would provide a total of 1,500 gaming positions. The 7th floor, which would be 63,375 square feet, would house nongaming amenities such as administration offices, lobby, coat check, sports bar, entertainment, retail, children's designated play area, video arcade, and a kitchen and dining area with a seating capacity of 200. Approximately 750 patrons would be accommodated on the 7th floor. Decks with landscaped terraces having a total area of 11,600 square feet would be located on the north and south sides of the 7th floor.

Parking Facilities

Six levels of parking are planned below the gaming facility. Each level of parking would be 70,800 square feet (424,800 square feet total) and collectively, the six levels would be expected to accommodate 1,500 vehicles. Approximately 1,475 standard spaces and 25 handicapped spaces would be available in the parking garage. Parking would be provided for 50 trucks and RVs in a surface lot located to the east of the casino structure, on trust land. Under Option B, an additional 50 parking spaces for large trucks and buses would be constructed on the Houston Property, directly to the south of the Historic Columbia River Highway and across the historic highway from the Mark O. Hatfield Trailhead and Visitor Center.

Signage and Lighting

Promotional signage would be limited to signs and lighting, using only what is needed to guide visitors to the facility. Casino signage would be similar to existing commercial signage in the I-84 corridor in terms of size, height, and illumination. Signs within the Columbia River Gorge National Scenic Area would meet the requirements of the Management Plan for the scenic area. The Tribe has agreed that signs and lighting at the casino would be in accordance with the same laws, ordinances, and codes that apply to any comparable commercial structure within the I-84 corridor and Hood River County.

Main sources of light that would result from this alternative include lighting from the parking lot (for safety and security purposes), lighting of the building exterior elevations facing public spaces (such as entrances), and car headlights. For the safety of patrons, visitors, and employees, roads, parking areas, and pedestrian walkways would be lit. The lighting elements would be strong enough to provide a safe environment at the ground surface. Vehicular areas (parking lots and roadways) would have pole-mounted lighting; walkways, stairs, and paths would have either pedestrian-scale height poles or light bollards. Use of shielded fixtures and full cut-off luminaries (i.e., light fixtures that emit no light above the level of the fixture) approved by the International Dark Sky Association would minimize lighting impacts to the surrounding vicinity.

Storm Water

The storm water management systems for Options A and B of the Hood River Alternative are described as follows:

Option A. Storm water would be managed through a series of storm drains and filters and eventually would be discharged into the ground via a groundwater injection system to be built in the southeastern portion of the trust land. Runoff from precipitation that falls on the undeveloped areas of the site would be diverted around the buildings downhill using existing drainageways.

Option B. Storm water would be completed through a series of storm drains, filters, and water quality ponds. Storm water runoff would eventually be discharged into the Columbia River via a series of existing ponds and wetlands located downslope of the proposed casino building. Precipitation runoff generated from the undeveloped area of the property would be routed around the casino site and continue to flow through natural drainageways.

Detailed descriptions of the proposed systems are provided in Appendix C.

Power

This alternative would require approximately 2.8 MW, which would be provided by Pacific Power and Light Company (Pacific Power). Pacific Power facilities near OR 35 would be upgraded to deliver this demand by way of underground lines, transformers, and switches within the right-of-way of the casino access road . Additional electrical power could also be obtained by upgrading the existing overhead lines on an adjacent property owned by the Tribe. If required, natural gas could be brought to the site from connections with existing NW Natural transmission facilities in the vicinity. Backup generators designed for 3.0 MW would be housed in a building in the east parking lot.

Telephone Service

Telecommunications would be made available through the local service provider, Sprint.

Potable Water Supply

It is estimated that water supply needs at peak use for the Hood River Alternative, including irrigation, would approach approximately 115 gallons per minute and the total average daily domestic water demand would be approximately 54,000 gallons per day. Irrigation needs are estimated at 60,000 gallons per day. Water supply for domestic, fire, and irrigation needs for Options A and B would be obtained as follows:

Option A. Water would be obtained from two wells that would be drilled south of the casino building on the trust property in a 6-acre area, with an additional 1 acre of cleared slopes. The water wells would be connected to a backup electrical generation system. Water from the wells would be stored in a 700,000-gallon water tank (reservoir) adjacent to the wells.

Option B. Water would be obtained from two existing wells located on the Christian Futures Property. These wells are expected to provide approximately 120 gallons per

minute combined. A third well could be developed on the trust land for additional supply. The water wells would be connected to a backup electrical generation system. Water from the wells would be stored in a 700,000-gallon water tank (reservoir) adjacent to the wells.

The 700,000-gallon water reservoir employed in Option A or B would have the capacity to store water sufficient to meet three days of domestic demand and one day of irrigation demand, along with a sprinkler system demand of 1,000 gallons per minute for four hours duration. The site would also have on-site fire hydrants designed to provide 1,500 gallons per minute for a two-hour duration.

Sanitary Sewer

The sanitary sewer systems for Options A and B of the Hood River Alternative are described as follows:

Option A. Wastewater would be treated by an on-site wastewater treatment plant (WWTP). The WWTP would be installed on the trust land southeast and up-slope of the proposed casino site, in the vicinity of the water supply wells and reservoir. The WWTP would be designed as a packaged activated sludge plant to treat effluents to tertiary treatment standards. It would include aerobic sludge digestion and dewatering. Ultraviolet light would be used to disinfect the effluent. Treated effluent would be discharged in underground injection controls (UIC) near the WWTP. Effluent would be treated to conform to U.S. Environmental Protection Agency (EPA) drinking water standards and discharged at ambient air temperature into the UICs. The WWTP and UIC would require an EPA permit and would be designed to comply with applicable EPA regulations and standards. A wastewater pump station would be located in a vault underground east of the casino building to deliver wastewater to the WWTP via pipelines. The pump station would have 100 percent backup power in the event of a power outage. The WWTP and pump station would be designed to accommodate an average of 1,800 guests per day, with a peak daily flow corresponding to three times the average daily flow of 36,000 gallons per day.

Option B. Wastewater would be treated by a WWTP located north of the casino building on the Bryant Property. The wastewater would be conveyed from the casino building to the WWTP by a gravity line. The WWTP would be designed as a packaged activated sludge plant to treat effluents to tertiary treatment standards. It would include aerobic sludge digestion and dewatering. Ultraviolet light would be used to disinfect the effluent. Effluent would be treated to conform to EPA drinking water standards and would be discharged at ambient air temperature into on-site ponds that feed into other ponds discharging to the Columbia River. The WWTP would be designed to accommodate an average of 1,800 guests per day with a peak daily flow corresponding to three times the average daily flow of 36,000 gallons per day.

Transportation Improvements

The Tribe would construct and maintain a private access road to the casino that connects with the Historic Columbia River Highway approximately 450 feet east of its intersection with OR 35. The 36-foot-wide casino access road would be a two-lane paved road with bike lanes and gravel shoulders (no sidewalks). The casino access road would be north of and roughly parallel to the Historic Columbia River Highway for 2,025 feet, then cross over and parallel the highway

to the south approximately 3,150 feet to the casino entrance. The overcrossing of the Historic Columbia River Highway could be designed to meet the visual performance standards of the I-84 Corridor Strategy for the Columbia River Gorge National Scenic Area (ODOT, 2005a), which were developed, in part, to complement the Historic Columbia River Highway.

Option A. Access to the water supply wells, reservoir, and WWTP would be from a 22-foot-wide gravel road from the east parking lot to the cleared area. The roadway alignment would be cleared to a 30-foot width to accommodate water lines.

Option B. Access to storm water and wastewater treatment facilities on the Bryant Property would be from a 22-foot-wide gravel road from parking lot of the Mark O. Hatfield Trailhead and Visitor's Center.

2.2.4 Warm Springs Alternative

Under this alternative, the Tribe would construct a casino on the existing Warm Springs Indian Reservation along US 26 (Figure 2-10). This casino would replace the existing casino at Kah-Nee-Ta. A new on-reservation casino would not require approval from BIA or the Secretary of the Interior; however, in accordance with IGRA, the Governor would be required to negotiate a compact with the Tribe for the Tribe to conduct Class III gaming on the reservation. Based on current trends, it is possible that a Tribal-State Compact for a new casino on the Warm Springs Indian Reservation would include provisions for revenue sharing.

The casino would be located on a 36-acre former gravel pit site approximately 1 mile west of the community of Warm Springs (Figure 2-11). The site is adjacent to US 26 and, therefore, more visible to travelers between Portland and Central Oregon and more likely to attract visitors than the existing casino at Kah-Nee-Ta. While a location directly accessible from US 26 may encourage visitors, the distance from the Portland metropolitan area, approximately 105 miles, would reduce the number of visitors, and therefore, the potential to generate revenue.

2.2.4.1 Ability to Address Economic Need

A casino at Warm Springs would be smaller than one in a more urban or accessible location. The market and economic study (Appendix B) determined that fewer visitors would travel to the site in this relatively isolated rural location. The proximity to Bend, Oregon, and the potential increase in visitors from that area were factored into the market analysis and financial projections of the Warm Springs Alternative. This alternative includes the largest facility considered financially feasible for the location.

This alternative would generate sufficient revenues to provide discretionary distributions of \$800,000 for the Tribe by 2012 (Appendix B). In following years, the discretionary distributions would not exceed \$21.7 million (Appendix B). The annual discretionary distributions would average approximately \$10 million per year from 2008 to 2018, which would only partially meet the needs of the tribal government.⁹

Note that the financial projections are estimates only and do not represent guaranteed income to the Tribe. Note also that the financial projections assume the Tribe would contribute to a

⁹ For purposes of comparison of alternatives, this EIS assumes the Tribe's financial obligations to the State are the same for all alternatives. Appendix B also provides financial projections for the Warm Springs Alternative if the Tribal-State Compact excludes provisions for the state to share a portion of the Tribe's revenues from the gaming facility.

Tribe-Oregon Benefit Fund and a Community Benefit Fund using the same payment system as described for the Cascade Locks Resort and Casino Project (see Section 2.2.2.2), although the Tribe has not committed to such contributions.

BIA decided to engage in a detailed consideration of this alternative to fully evaluate an on-reservation alternative, and this Warm Springs Alternative would come closest to meeting the Tribe's economic needs.

Because this alternative would not generate sufficient income to meet the Tribe's financial need, it is reasonable to expect that the Tribe would seek other sources of income. As with the No Action Alternative described above, the Tribe may plausibly decide to use its fee and trust land east of Hood River for timber harvest or gravel mining. The fee land could be sold; the trust land could be developed with commercial uses. Depending on the type of activity and involvement of third party users, certain activities on the trust land would require review and approval by the BIA.

2.2.4.2 Facilities

Casino Building

The proposed casino building would be a single-story structure with a gross footprint of 51,000 square feet. Operation of the proposed casino would require a staff of approximately 310 employees. The gaming facility would consist of approximately 430 VLT machines, 14 table games, Keno area, and a three-table poker room. The facility would provide a total of 560 gaming positions. Nongaming facilities would include two dining areas: a 106-seat buffet and a 42-seat deli.

Parking Facilities

Parking facilities would consist of a surface level parking lot with 658 standard stalls, 20 truck stalls and 25 RV stalls, for a total of approximately 703 parking spaces (654,805 square feet).

Signage and Lighting

The Warm Springs Alternative would employ promotional signage to attract visitors. Casino signage would be similar to existing commercial signage used for the Kah-Nee-Ta casino in terms of size, height, and illumination.

Main sources of light that would result from this alternative include lighting from the parking lot (for safety and security purposes), lighting of the building exterior elevations facing public spaces (such as entrances), and car headlights. For the safety of patrons, visitors, and employees, roads, parking areas, and pedestrian walkways would be lit. The lighting elements would be strong enough to provide a safe environment at the ground surface. Vehicular areas (parking lots and roadways) would have pole-mounted lighting; walkways, stairs, and paths would have either pedestrian-scale height poles or light bollards.

Storm Water

Storm water for the Warm Springs Alternative would be managed through a series of storm drains and filters, contained completely onsite. Runoff from precipitation in the undeveloped portions of the parcel would be diverted around the buildings and downhill using existing

drainageways. Only 25-year events or greater would be discharged to Shitike Creek. A detailed description of the proposed system is provided in Appendix C.

Electric Service

This alternative would require an estimated 2.0 MW of power. Electricity provided from the Warm Springs community substation facilities would be upgraded to deliver this demand by way of overhead lines, transformers, and switches along existing transmission lines on US 26 to the proposed casino site. Additional electrical power could be provided if needed by upgrading and connecting to the existing overhead lines on an adjacent property owned by the Tribe. Backup generators designed for 3.0 MW would be housed in a building northwest of the parking lot as shown on the preliminary site plan (Figure 2-11).

Telephone Service

Telecommunications would be made available through the local service provider, Qwest. Existing underground lines would be upgraded along US 26 to the proposed casino site.

Potable Water Supply

Water supply for domestic, fire, and irrigation needs would be delivered from the Warm Springs community system. Water from the system would be stored in a 700,000-gallon water tank (reservoir) located northwest of the casino building. The reservoir would be supplied via 9,730 linear feet of new 10-inch water line connected to the existing 12-inch main transmission line. It is estimated that the needs at peak use, including irrigation, would approach approximately 95 gallons per minute and the total average daily domestic water demand would be approximately 36,000 gallons per day. Irrigation needs are estimated at 48,000 gallons per day. The water reservoir would have the capacity to store water sufficient to meet three days of domestic demand and one day of irrigation demand, along with a sprinkler system demand of 1,000 gallons per minute for duration of four hours. On-site fire hydrants would be designed to provide 1,500 gallons per minute of fire-suppression water for up to four hours. Water lines for the suppression system would consist of 2,934 linear feet of 14-inch pipe.

The estimated water requirements of the Warm Springs Alternative would require substantial upgrades to the existing water service system.

Sanitary Sewer

Wastewater would be conveyed from the casino to the Warm Springs WWTP, which currently treats 240,000 gallons per day and has a design capacity for 870,000 gallons per day. The casino at Warm Springs is expected to generate wastewater at an average rate of approximately 20,660 gallons per day.

The Warm Springs Alternative would require an upgrade to the sanitary sewer collection system that would include installation of 1,630 linear feet of 8-inch gravity pipeline from the casino to a new 50,000-gallon wetwell and pump station with emergency power backup generation located along Shitike Creek Road. The new wetwell and pump station would discharge 50 gallons per minute to a new 6,051-linear foot/4-inch pressure main to be installed along Shitike Creek Road. The new facilities would convey sewage to the gravity collection system and ultimately to the Warm Springs WWTP.

Transportation Improvements

Severe weather conditions, steep grades, heavy truck traffic, and heavy peak hour traffic volumes along this segment of US 26 would dictate the need for a new interchange to provide safe and adequate travel to and from the Warm Springs Alternative casino.

The proposed interchange would be a full directional diamond configuration with direct connectivity to and from US 26. This interchange would require an undercrossing of US 26 approximately 80-feet wide. Due to the existing grade at the proposed location of the interchange, the road would need to be significantly widened for safe vehicle merging. Westbound traffic from the casino merging onto US 26 would require a 2,200-foot acceleration lane. Westbound traffic to the casino exiting US 26 would require a 778-foot deceleration lane. Eastbound traffic from the casino would require an 850-foot acceleration lane to safely merge onto US 26, and eastbound traffic to the casino would require a 785-foot deceleration lane to exit US 26.

2.3 Alternatives Considered but Eliminated from Further Consideration

The following alternatives were considered but eliminated from detailed consideration in the EIS because they are not reasonable or feasible, or because they would not adequately meet the purpose of and need for agency action. Specifically, these alternatives would not meet the economic need of the Tribe, are not supported by tribal members, are not supported by the local community, or involve land that the Tribe does not own and in which it has no aboriginal interest or connection. Although the Warm Springs Alternative (see Section 2.2.4) also would not meet the Tribe's economic needs, it was included among the alternatives that were fully considered because, among on-reservation alternatives, it would come closest to meeting the Tribe's economic needs.

2.3.1 Smaller Casino at Cascade Locks

Comments received during the scoping process for this EIS included recommendations that the Tribe develop a smaller casino at the Port of Cascade Locks to reduce adverse environmental effects. The proposed project examined in detail in this EIS is the maximum build-out for the project site as described in the Tribal-State Compact; therefore, the EIS presents a "worst case scenario" with respect to adverse environmental effects of the project. The size of the proposed casino at Cascade Locks is based on market analysis (Appendix B), which considers anticipated visitation. A smaller casino at the Cascade Locks site would not meet the anticipated demand and would not meet the business plan that the Tribe has developed for the casino. A smaller casino would have a negative effect on the Tribe's ability to operate the casino successfully.

2.3.2 Expansion of the Casino at Kah-Nee-Ta

This alternative would involve expanding the casino facilities at the existing Kah-Nee-Ta High Desert Resort and Casino on the Warm Springs Indian Reservation. Expansion could include additional gaming positions and additional entertainment venues.

Kah-Nee-Ta is located approximately 107 miles and 68 miles from population centers in Portland and Bend, Oregon, respectively. It is 11 miles from the nearest intersection with US 26. This remote location would continue to limit the casino's ability to attract visitors.

While the existing gaming facility at Kah-Nee-Ta has had continued growth in total revenues over the last 10 years, annual discretionary distributions to the Tribe have been in the range of \$2 million to \$4 million. In addition, when considering the number of gaming positions and total wins per day, the casino has been underperforming (i.e., current revenues are below potential earnings) (Ford, 2006b). Based on the current financial status of the casino at Kah-Nee-Ta, an investment in an expanded casino facility would not be feasible or prudent. Any additional revenue generated by an expanded facility would be insufficient to justify the expansion and would not satisfy the Tribe's government needs of approximately \$26 million per year.

2.3.3 Other On-Reservation Casino Locations

Two other locations for an on-reservation casino were examined: He He Junction and a site adjacent to the Museum at Warm Springs. Both locations would be on tribal lands. A casino at either of these locations would be accessible directly from US 26 and, therefore, more visible to travelers between Portland and Central Oregon and more likely to attract visitors than the existing casino at Kah-Nee-Ta. While a location directly accessible from US 26 may encourage visitors, the distance from the Portland Metropolitan area could limit the number of visitors and therefore reduce the potential to generate revenue. The proximity to Bend, Oregon, and the potential increase in visitors from that area was factored into the market analysis and financial projections of an on-reservation casino at these locations.

2.3.3.1 He He Junction

He He Junction is approximately 16 miles west of the town of Warm Springs at the intersection of US 26 and the reservation road to Simnasho (Route 9). He He Junction is located approximately 89 miles from the Portland market. Currently, there is no development at He He Junction, and no utilities infrastructure or other amenities. Providing utilities infrastructure at this site would add considerable cost to the development. He He Junction is considered a traditional cultural property based on its prior and ongoing use as a gathering place for tribal members. Development of a casino at this location would diminish the quality of the site for traditional use.

In the first five full years of operation (2009-2013), a casino at He He Junction would not generate sufficient revenues to provide discretionary distributions for the Tribe (Appendix B). The first year in which discretionary distributions would be available would be 2014, at which point discretionary distributions are projected to be \$13.2 million. In following years, the discretionary distributions would not exceed \$21.8 million (Appendix B). Based on the 11-year projection period (2008 to 2018), the average annual discretionary distributions to the Tribe would be approximately \$8 million, which would only partially meet the needs of the tribal government.

Because of the traditional cultural use of He He Junction and its inability to meet anticipated tribal government needs and promote economic self sufficiency for the Tribe, this alternative was eliminated from further consideration. Furthermore, in Resolution No. 10,629, the Tribal Council effectively decided against further consideration of the He He Junction site for a new the on-reservation casino by selecting the former gravel pit site as the Warm Springs Alternative.

2.3.3.2 Museum Site

The Museum at Warm Springs was established in 1993 within the town of Warm Springs, approximately one mile east of the intersection of US 26 and the road to Kah-Nee-Ta (Route 3). The museum site is located approximately 106 miles from the Portland market. A casino at this location could make use of existing utilities infrastructure or other amenities; however, the floodplain of Shitike Creek limits the amount of developable land in this area. In accordance with

Tribal Ordinance 74, the Integrated Resources Management Plan, extensive mitigation would be required for development in the floodplain area.

A casino at the museum site would have the same financial forecast as the Warm Springs Alternative site (see Section 2.2.4.1) and would only partially meet the needs of the tribal government.

2.3.4 Casino Development in the City of Madras

At one time, the Tribe considered locating a casino on existing trust land within the City of Madras. Development of a casino on this trust land would not require approval from BIA or the Secretary of the Interior; however, the Governor would be required to negotiate a Compact with the Tribe for the Tribe to conduct Class III gaming in the City of Madras.

Casino development was considered on trust land that is the current location of the Warm Springs Forest Products Enterprise loading dock at the north end of the City of Madras, outside the Warm Springs Indian Reservation. The benefit of this location would be its convenient access from US 26, although the available market would be limited by its distance (120 miles) from the Portland Metropolitan area.

In April 2000, the Tribal Council issued a referendum (No. 9870) seeking approval from the tribal membership to develop a casino at the loading dock site.¹⁰ In May 2000, the tribal membership voted against the referendum and it was defeated. As a result, this alternative was eliminated from further consideration.

2.3.5 Casino Development at Government Rock

As described in Section 2.1.2, the Tribe, in initial discussions with the City of Cascade Locks, considered developing a casino on a peninsula in the Columbia River known as Government Rock, which is within the city limits. Development of Government Rock for purposes of operating a gaming facility would require a fee-to-trust transfer by BIA and compliance with IGRA Section 20.

The Tribe purchased Government Rock in April 2000 and initiated an Environmental Assessment in support of a fee-to-trust application for the property. Development of Government Rock would require new utilities and roadway infrastructure, including modification of the partial I-84 Herman Creek Interchange that could extend outside of the city's Urban Growth Boundary.

The Tribe eliminated Government Rock as a possible location for a casino when the City of Cascade Locks and community leaders identified the Port of Cascade Locks site (i.e., proposed project site) as a more suitable location. The Port of Cascade Locks site has existing utilities infrastructure and access improvements could be made within the Urban Growth Boundary. Because Government Rock would require additional infrastructure and provide no additional economic benefit relative to the Cascade Locks site, the Government Rock alternative was eliminated from further consideration.

¹⁰ Article VI of the Tribe's Constitution and Bylaws as amended (Approved February 14, 1938) requires the Tribal Council submit to a vote of the people any "matter of great importance [that] comes before the Tribal Council." The decision of the Tribe to undertake the enterprise of gaming and the location for such a gaming enterprise are "matter[s] of great importance" that have been submitted to the tribal membership on several occasions.

2.3.6 Casino Development in the Portland Area

Comments received during the scoping process for this EIS included recommendations that the Tribe locate a gaming facility in the City of Portland. This alternative is not considered in this EIS for the following reasons:

- There are no lands held in trust status for the Tribe in the Portland area, nor does the Tribe currently own land in the Portland area.
- There is no evidence that tribal members would support a Portland location for a gaming facility. Tribal referenda issued to date direct the Tribe to seek gaming locations either on the Warm Springs Indian Reservation or in the Columbia River Gorge. Both areas are located within the Ceded Lands and aboriginal title areas; the Portland area is not.
- It is the Governor's stated policy with respect to the establishment of off-reservation gaming that, at a minimum, the local community should support the proposal. The Portland community does not currently support casino development, and the Mayor of Portland is opposed to any casino development within the City. The Governor has also stated that he does not support casino development in Portland.
- If the Tribe were to purchase land in the City of Portland and seek a fee-to-trust transfer for purposes of developing a gaming facility, it would require BIA approval in accordance with the trust acquisition regulations in 25 CFR Part 151 and approval by the Secretary of the Interior in accordance with Section 20 of IGRA (two-part determination). Given that the Governor does not support a Portland location, it would be highly unlikely the Tribe would obtain the required concurrence of the Governor with a positive recommendation by the Secretary of the Interior to acquire such Portland fee property in trust under Section 20 of the IGRA.

2.3.7 Casino Development in Bend/Redmond

Comments received during the scoping process for this EIS included recommendations that the Tribe locate a gaming facility in the Bend/Redmond area. For the following reasons, this alternative was eliminated from further consideration.

- As with a Portland area location, there are no lands held in trust status for the Tribe in the Bend/Redmond area, the Tribe does not currently own land in the Bend/Redmond area, nor is the Bend/Redmond area in the Tribe's "aboriginal title" territory as determined by the Indian Claims Commission in *Confederated Tribes of the Warm Springs Reservation of Oregon v. United States* (Docket No. 198). The Tribe would need to purchase land and seek a fee-to-trust action for purposes of developing a gaming facility, which would require BIA approval in accordance with 25 CFR Part 151 and approval from the Secretary of the Interior in accordance with Section 20 of IGRA (two-part determination).
- There is no evidence that the Tribe would support a Bend/Redmond location for development of a casino. Rather, the Tribal membership has already rejected a central Oregon casino location on its trust land in Madras, which indicates there is only a remote or speculative possibility that the Tribal membership would support a central Oregon casino location outside the reservation in Bend/Redmond.
- There has been no evidence of local community support for a casino within the Bend/Redmond area. The local community would need to demonstrate support of such

development for the Governor to concur and support a positive recommendation by the Secretary of the Interior under Section 20 of the IGRA.

2.3.8 Casino Development in The Dalles or Other Eastern Oregon Location on I-84

Comments received during the scoping process for this EIS included recommendations that the Tribe locate a gaming facility in The Dalles or another eastern Oregon location along I-84 (e.g., Biggs, Arlington, and Umatilla Army Depot). The City of The Dalles has previously discussed with the Tribe opportunities for developing a casino, demonstrating community support for such development, which could lead to the Governor's concurrence and a positive recommendation by the Secretary of the Interior under Section 20 of the IGRA. However, there is no evidence that the Tribe would support development of a casino in these areas.

The Dalles, representing the westernmost of such potential locations, is located 84 miles east of the City of Portland along I-84. It is primarily an industrial town and has available infrastructure and flat land suitable for resort/commercial development, some of which has convenient access to I-84, which would provide high visibility for a casino to attract drive-through travelers. The disadvantage of The Dalles and locations further east is the distance from the Portland metropolitan area, which would limit the ability to serve that market.

A casino could be developed on trust land that is a sand dune east of The Dalles. The benefit of this location would be its proximity to I-84, although potential visitors may be discouraged by its distance from the Portland metropolitan area.

The trust land has been in trust prior to 1988 and is eligible to be developed for gaming under IGRA. Due to the geotechnical properties of the sand dune, the site poses many safety and constructability issues. Access to the site would be very complex and expensive.

If another Eastern Oregon location on I-84 were considered, the Tribe would need to purchase land and seek a fee-to-trust action to develop a gaming facility, which would require BIA approval in accordance with 25 CFR Part 151 and approval by the Secretary of the Interior in accordance with Section 20 of IGRA (two-part determination).

As distance from the Portland metropolitan area increases, the number of potential casino visitors and their income levels decline, contributing to a decline in revenues. Financial projections for development of a casino in The Dalles prepared for the Tribe by ECONorthwest in January 2006 (Appendix B) indicate that, assuming the casino would become operational in 2008, it would not generate sufficient revenues to provide discretionary distributions for the Tribe until 2013. Assuming the Tribe would negotiate a compact with the Governor that would have the same revenue-sharing agreement as described in the Tribal-State Compact for Cascade Locks, the discretionary distributions for the Tribe in 2013 would be approximately \$6 million (Appendix B). By 2014, discretionary distributions would be \$35 million. Based on the 11-year projection period (2008 to 2018), the average annual discretionary distributions to the Tribe would be approximately \$16 million, which would not meet the needs of the tribal government. Note that the financial projections are estimates only and do not represent guaranteed income to the Tribe.

Because alternatives in The Dalles and other eastern Oregon communities would not meet the economic needs of the tribal government and have no definitive support from tribal members, these alternatives were eliminated from further consideration.

2.3.9 Casino Development at a Location on Interstate 5

Comments received during the scoping process for this EIS included recommendations that the Tribe locate a gaming facility somewhere along the Interstate 5 (I-5) corridor. Similar to other potential casino locations, there are no lands held in trust status for the Tribe in the I-5 corridor, nor does the Tribe currently own land in these areas. The Tribe would need to purchase land and seek a fee-to-trust action to develop a gaming facility, which would require BIA approval in accordance with 25 CFR Part 151 and approval by the Secretary of the Interior in accordance with Section 20 of IGRA (two-part determination). The Tribe desires acquisition of trust land within its ceded area; the I-5 corridor is outside the Tribe's ceded lands and aboriginal title lands. There is no evidence that tribal members would support a casino at an I-5 location, and the prevailing evidence of tribal membership referendum votes is that they would not support such a location. There is also no evidence that a community in that corridor would support it and without such support the Governor would not concur. For these reasons, an I-5 alternative was eliminated from further consideration.

2.3.10 Development of a Riverboat Casino

Comments received during the scoping process for this EIS included recommendations that the Tribe consider a riverboat casino. Such a facility would, under IGRA, require the acquisition of fee title into trust by the U.S. Government for the benefit of the Tribe of submersible and submerged lands. Such an acquisition would not be viable. In Oregon, submerged lands fall under state ownership and the Oregon State Land Board has an Oregon Constitutional responsibility to manage "the lands under its jurisdiction with the object of obtaining the greatest benefit for the people of this state consistent with the conservation of this resource under sound techniques of land management" [Oregon Constitution, Article VIII, Section 5(2)]. Under Oregon law, submerged lands may not be sold "except to facilitate the legal disposal of hazardous material as part of a plan approved by the appropriate state and/or federal environmental agencies." OAR 141-067-0140(12). Any sale of submersible lands would likely only be authorized upon a finding that the transaction would accrue a net gain in public trust values to the people of Oregon. OAR 141-067-0140(13).

An acquisition of submerged lands for the purposes of a casino would clearly not meet the requirement of OAR 141-067-0140(12), restricting such sales to facilitate the legal disposal of hazardous materials. There is also no clear indication that the sale of submerged lands for the casino would result in a net gain in public trust values to the people of Oregon, as would likely be required by the State Land Board and is likely required under the Oregon Constitution. Oregon Constitution, Article VIII, Section 5(2); OAR 141-067-0140(13).

2.3.11 Nongaming Alternatives

As outlined in the Tribe's *Update of IGRA Sec. 20(b)(1)(A) Consultation Response of August 15, 2005 and Information Regarding Nongaming Alternatives to Cascade Locks Casino* (May 8, 2006), the Tribe has considered and developed a number of enterprises to improve its economy. The Tribe has established several for-profit, nongaming economic enterprises under the Tribe's Corporate Charter and the Constitution and Bylaws. These enterprises do generate revenues to the Tribe; however, as described in Section 1.3, ongoing economic activity on the reservation has generated inadequate income to meet the basic governmental needs of the Tribe or to ensure the sustainable long-term economic health for the Tribe and its members.

Given the remote location of the reservation, economic opportunities are limited. Other hurdles to immediate economic development on the reservation include the lack of infrastructure to support development, the lack of financial institutions on the reservation, and the lack of a Tribal

Uniform Commercial Code (UCC). In the current socio-economic environment on the reservation, the Tribe also struggles to develop and retain a reliable and skilled workforce on the reservation, which in turn creates difficulties when trying to improve economic opportunities. While the Tribe is considering ways to overcome some of these hurdles—for example, it is considering a Tribal UCC for adoption—the Tribe must evaluate solutions in the context of issues related to tribal sovereignty, as well as tribal member sensitivity to nonmember investment in and use of the reservation.

The Tribe has been and will continue to pursue nongaming economic alternatives on and off the reservation. The potential for job creation and revenue generation by nongaming alternatives, however, is very limited without significant capital investments. In addition to the capital investment challenge, the Tribe must also be sensitive to and address other hurdles for economic development on the reservation. The Tribe is committed to providing tribal member education, creating jobs and economic opportunities, and promoting self-sufficiency for its members, but the nongaming solutions are long term and depend on an influx of capital in the short- and medium-term that is not possible given the worsening Tribal budget crisis. Whether these nongaming alternatives would ever meet the Tribe's economic needs cannot be reasonably ascertained. The nongaming opportunities that are available to the Tribe lack sufficient revenue potential and do not provide a viable or reasonably attainable avenue to meet the Tribe's acute and chronic economic and social needs in the near term.

2.4 Comparison of Alternatives

This section summarizes and compares the key beneficial and adverse effects of the proposed Cascade Locks Resort and Casino, the Hood River Alternative, the Warm Springs Alternative, and the No Action Alternative, as determined in Chapter 4 and the technical analyses performed in support of this EIS. Table 2-1 provides a summary of the economic benefits and environmental and human effects. The following paragraphs describe how BIA compared the impacts associated with the proposed action.

2.4.1 No Action Alternative

The No Action Alternative would have no direct effect on the natural or human environment of Cascade Locks, Hood River, or Warm Springs in the near term. Future development at the Port of Cascade Locks Industrial Park site could occur and would likely be consistent with the current zoning of the site (industrial) and limited by the indirect access to I-84 and the at-grade crossing of the UPRR tracks. Future use of the Hood River site could involve timber harvest, mining, or other uses as allowed by current tribal (trust land) and local zoning (fee lands) regulations. Future use of the Warm Springs site could involve construction equipment staging or gravel extraction, similar to recent and past uses.

Under this alternative, the Tribe would continue to face a serious financial situation caused by steadily declining tribal revenues and shrinking tribal budgets. The Tribe has identified an existing annual governmental need (budget shortfall) of \$26 million. With the projected growth in the tribal population, the social and economic needs of the community (e.g., health care, housing, education, employment, and job skills) will continue to rise, resulting in greater governmental need.

Although the No Action Alternative would result in no substantial adverse impact to the human and natural environment in the three study areas, it would adversely affect the Tribe's ability to improve its financial position and provide crucial government services to tribal members. The No

Action Alternative would not meet the purpose of and need for the proposed action, which is to improve the Tribe's long-term economic condition and support its self-sufficiency.

2.4.2 Proposed Project: Cascade Locks Resort and Casino

The proposed fee-to-trust transfer and the Tribe's development of a resort and Class III gaming facility in Cascade Locks would provide sufficient revenue for the Tribe to address its governmental needs within four years of opening. The proposed project also would provide capital for investment in tribal infrastructure and enterprises that can create long-term economic stability and self-sufficiency for the Tribe. With the proposed project, the Tribe would have the ability to meet the social and economic needs of its members.

The proposed Cascade Locks Resort and Casino project would be developed within the urban growth boundary of Cascade Locks at the Port of Cascade Locks Industrial Park. Because the proposed facilities are within the urban growth boundary of Cascade Locks, the proposed project would be exempt from the requirements of the Columbia River Gorge National Scenic Area Act and Management Plan. The proposed project would be consistent with the intent of the Act, which encourages growth and economic development in urban areas of the Columbia River Gorge. The project site is zoned for industrial use and the proposed use of the lease parcels would be consistent with this zoning. The fee-to-trust parcel would be exempt from local zoning requirements once it is brought into trust. Once the parcel is in trust, it would be managed under Tribal code (Ordinance 56 - Zoning and Land Use Code). Most of the project site has been disturbed by fill and previous development.

The proposed project would create over 2,000 jobs in the region (i.e., total direct, indirect, and induced jobs; see Table 2-1). Housing needs and other development that would occur as a direct or indirect result of the proposed project would contribute to the economic growth of Cascade Locks and the surrounding communities, and would be in conformance with growth management plans and other land use plans and policies. The demand on public services would increase but could be addressed with revenues from the Community Benefit Fund.

Transportation improvements associated with the proposed project would contribute to the improvement of the Cascade Locks traffic circulation system by providing needed direct access to the Port's Industrial Park with a fully directional interchange at the existing Forest Lane overpass. With a new interchange, ramps at adjacent interchanges would be closed to bring the interchanges in Cascade Locks closer to ODOT's interchange spacing standards. Traffic accessing downtown from east of Cascade Locks would use the new Forest Lane Interchange and Frontage Road or Forest Lane to reach WaNaPa Street. Travel times on these new routes would be 1 minute and 21 seconds longer (via Frontage Road) to 1 minute and 37 seconds longer (via Forest Lane) than existing conditions.

Increased traffic associated with the resort and casino would contribute incrementally to regional congestion on westbound I-84. The Tribe would work, in consultation with ODOT, to minimize the effect of traffic generated by the resort and casino on I-84 mobility. The BIA would work with ODOT to develop an Interchange Area Management Plan to protect the function of the interchange and ensure safe and efficient operation between the interchange and connecting roadways.

Increased traffic on the Historic Columbia River Highway in Cascade Locks (Forest Lane and WaNaPa Street) would not affect the integrity of that resource. New roadway construction would alter a 1,400-foot segment of the historic highway (Forest Lane immediately west of its intersection with Port Industrial Parkway). BIA recommends a finding of no adverse effect on

this segment of the historic highway with conditions to protect the integrity of the resource. These conditions are to be developed with the Historic Columbia River Highway Advisory Committee and the signatories of the Programmatic Agreement for the historic highway as it passes through the city of Cascade Locks (i.e., FHWA, ODOT, SHPO, City of Cascade Locks, and Hood River County). The proposed project would not affect the setting of this segment of the historic highway, which is currently rural industrial.

Temporary disturbance to bald eagle (listed as “threatened” under the Federal Endangered Species Act) forage habitat in Columbia River shoreline and adjacent open water areas could occur as a result of construction noise; however, no loss to the species population or long-term change in forage activity is anticipated. Noise muffling devices would be used on all construction equipment to minimize this disturbance. Construction related to the widening of the I-84 bridge over Herman Creek would disturb the stream channel and riparian vegetation, adversely affecting Lower Columbia River Chinook, coho, and steelhead (listed as threatened under the Federal ESA) and their critical habitat. To minimize these effects, in-water work would be isolated from the stream and fish would be moved outside of the construction area. The storm water management system for the site would minimize pollutant discharge to fish-bearing streams, resulting in no long-term adverse effect on listed species or their habitat. Additional avoidance, minimization, and conservation measures for project construction and operation may be agreed upon by federal government representatives as conditions of the final federal Letter of Concurrence or Biological Opinion. These measures would be incorporated into the project design, construction, and operating plans.

The proposed project would have a low to medium impact on scenic resources within the project vicinity. The visibility of the resort and casino building from key viewing area is low as a result of the topography, which permits only limited visibility from key viewing areas. The new Forest Lane Interchange and associated roadway improvements would be most visible from I-84 within the urban growth boundary. Removal of mature trees in the interchange area would have a negative visual impact (medium), whereas removal of industrial facilities on Forest Land to construct the loop road and Forest Lane/UPRR overpass would have a positive visual impact (low).

The Tribe would grant to the State a perpetual conservation easement to the Tribe’s Hood River trust and fee lands, which are within the Columbia River Gorge National Scenic Area. The easement would prohibit development of those lands (except limited recreational development) and would contribute to the long-term protection of scenic, natural, and cultural resources in the region.

2.4.3 Hood River Alternative

The Hood River Alternative (Options A and B) would provide sufficient revenue for the Tribe to address its current shortfall of \$26 million in governmental needs within seven years of opening. This alternative would provide capital for investment in tribal infrastructure and enterprises that can create long-term economic stability and self-sufficiency for the Tribe. With this alternative, the Tribe would meet the social and economic needs of its members.

The Hood River Alternative would convert currently undeveloped lands surrounded by lands zoned Forest, Open Space, and Public Recreation to develop an eight-story commercial building and related facilities. Option A would site all project facilities on 23 acres of the Tribe’s 40-acre trust parcel south of the Historic Columbia River Highway. Option B would site project facilities on 27 acres of trust and fee-to-trust parcels totaling 223 acres. Both options would require 5.5 acres of easement for the casino access road. Option B would convert 174 acres of

land currently protected by the Columbia River Gorge National Scenic Area into trust land. Trust lands area exempt from regulatory authority of the Columbia River Gorge National Scenic Area Act and Management Plan.

The Hood River Alternative would result in loss of forested habitat, primarily coniferous and deciduous forest and oak woodland that provides diverse and intact wildlife habitat for a variety of birds, small and large mammals, reptiles, amphibians, and invertebrates for most of the year. Species within the vicinity of the Hood River Alternatives could also be adversely affected by noise, light, and overall human presence resulting from a casino. Impacts to Federal ESA listed species are not anticipated.

The Hood River Alternative would have an adverse effect on the Historic Columbia River Highway. The overpass for the casino access road and the casino structure would alter the visual setting for the highway, and increased auditory elements from facility operations and traffic along the casino access road would compromise the integrity of the highway's historic character. Additional traffic on a small segment of the historic highway (i.e., 450 feet from OR 35 to the casino access road) would also adversely affect this resource.

The Hood River Alternative would result in net employment growth of approximately 1,100 jobs in the region. Housing needs and other development that would occur as a direct or indirect result of the Hood River Alternative would contribute to the economic growth of Hood River and the surrounding communities, and would be in conformance with growth management plans and other land use plans and policies. The demand on public services would increase but could be addressed with revenues from the Community Benefit Fund.

Under the Hood River Alternative, the clearing of trees, substantial excavation of the hillside and construction of the casino and access road would alter the scenic resources within the vicinity. The scenic resources and key viewing areas of the Columbia River Gorge, as identified in the Columbia River Gorge National Scenic Area Management Plan, would be adversely affected by a new, visually dominant feature in the natural landscape. Impacts would be low/medium (i.e., in the view from the Historic Columbia River Highway of access road overpass) to medium/high (i.e., view from Washington near SR 14 to the project site).

The intersection of OR 35 and the Historic Columbia River Highway in Hood River currently operates at unacceptable levels and casino traffic at the intersection would exacerbate this problem. Opportunities for adding capacity at this intersection have been investigated in previous studies (ODOT 2005b), but are limited by the presence of the historic highway and the physical constraints of this area (topography, the Hood River). The Hood River Alternative would adversely affect traffic mobility on the interstate system at the Exit 63/Exit 64 westbound weave section by exceeding ODOT's mobility standard for that section. A proposed improvement to divert local trips from the interstate (identified in a study specifically related to Exit 64; Parsons Brinkerhoff, 2005) would bring mobility on the interstate to an acceptable level with the Hood River Alternative. The Tribe would work, in consultation with ODOT, to minimize the effect of traffic generated by the casino on the Exit 63/Exit 64 westbound weave section.

2.4.4 Warm Springs Alternative

Revenues from the Warm Springs Alternative would not reach levels to satisfy the Tribe's current shortfall of \$26 million within 10 years. Considering that the Tribe's current shortfall is expected to increase as revenues continue to decline and tribal membership grows (see Section 1.3.2), it can be inferred that the shortfall would be more than \$26 million in 10 years. With insufficient revenue to provide capital for investment in tribal infrastructure and enterprises, this

alternative would not create economic stability and self-sufficiency for the Tribe. This alternative would not improve the Tribe's long-term economic condition.

The Warm Springs Alternative would be developed on lands currently designated for agricultural use (grazing) and would require a conditional use permit or zoning change; however, because the site has been used as a gravel pit and construction staging and material storage area, the effect on land use would be minor.

The available habitat on the site is limited as a result of grazing and past mining operations. An ephemeral stream and riparian habitat along Shitike Creek could be disturbed by utility line construction; however, these effects would be minimized by placing the utilities in existing roadbeds. Storm water runoff from the casino site would be managed to minimize adverse effects to Shitike Creek water quality and aquatic habitat.

Construction of the proposed interchange with US 26 would affect 11 known archaeological sites. These effects could be mitigated with subsurface investigation, appropriate documentation, and retrieval. The Warm Springs Alternative also would have an indirect adverse effect on a cemetery north of the site by creating a visual intrusion in the traditional use of the cemetery and diminish the quality of the cemetery.

Operations of the Warm Springs Alternative would result in net employment growth in the region of 400 jobs. Housing needs associated with new jobs in the region would place additional demand on the Warm Springs Indian Reservation, which currently experiencing a housing shortage. The demand on public services would increase but could be addressed with revenues from the Community Benefit Fund.

The Warm Springs Alternative would require the construction of a new interchange on US 26 to provide safe access to the site, although access in this expressway section of US 26 may not comply with ODOT requirements. The Tribe would coordinate with ODOT to develop acceptable access to the site from US 26. With the addition of the Warm Springs Alternative, traffic volumes on US 26 and other roads in the region would meet ODOT mobility standards.

Although the development would be visible from US 26 and some rural areas within and surrounding the Warm Springs community, the effect of the development on visual resources would be minor.

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
Economic Benefit to the Tribe					
Discretionary distributions from resort/casino facilities (annual average 2008 to 2018)	\$2.5 million ²	\$77 million	\$30 million	\$38 million	\$10 million
First year that annual discretionary distributions are projected to meet or exceed \$26 million (i.e., the Tribe's 2005 Adjusted Governmental Needs) ³	Unmet	2011	2014	2014	Unmet
Land Resources					
Earthwork	None	Excavation and removal of 50,000 cubic yards of material for interchange area; surface grading and excavation on Industrial Park site designed to use of all excavated materials as fill on site.	Excavation of 1,800,000 cubic yards of material (1,500,000 cubic yards for the building site and 300,000 cubic yards for the access road).	Excavation of 1,300,000 cubic yards of material (1,000,000 cubic yards for the building site and 300,000 cubic yards for the access road).	Surface grading and excavation on site designed to use of all excavated materials as fill on site.
Land Use					
Change in land use	No direct change; vacant lands can be expected to develop in future years consistent with existing zoning	Fee-to-trust transfer of 25 acres; conversion of 25 acres of industrial land to resort commercial use and 35 acres of industrial land to parking; right-of-way acquisition for proposed interchange approximately 18 acres.	Conversion of 23 acres of undeveloped trust land (mostly forested) to commercial development and access road; Tribe to obtain easement on 5.5 acres for access road.	Fee-to-trust transfer of 175 acres; conversion of 27 acres of trust land (mostly forested) to commercial development and access road; Tribe to obtain easement on 5.5 acres for access road.	Conversion of 36 acres of land zoned agricultural to resort commercial use.

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
Conformance with plans and policies	In conformance	Trust land is exempt from local plans and policies. Development on parcels to be leased from the Port of Cascade Locks would be in conformance, no zoning changes required; development within urban area of Columbia River Gorge National Scenic Area. City of Cascade Locks Comprehensive Plan and Transportation System Plan would need to be amended to incorporate Interchange Area Management Plan required for the new I-84 interchange.	Trust land is exempt from local plans and policies. Tribe claims exemption for casino access road. ⁴ U.S. Forest Service claims access road would be subject to consistency review (see Section 4.2.3).	Trust land is exempt from local plans and policies. Tribe claims exemption for casino access road. ⁴ U.S. Forest Service claims fee-to-trust action would be inconsistent with the Columbia River Gorge National Scenic Area Act. and access road would be subject to consistency review (see Section 4.2.3).	Conditional use permit required.
Effect on residential land based on housing needs for facility employees and employees from induced economic development	None	Additional demand for housing (689 units) would be met by available inventory and developable residential lands in Cascade Locks and surrounding communities. Limited residential land in Hood River County. Demand on Hood River County housing (178 units) could contribute to projected housing deficit in the County by 17%.	Most of the additional demand for housing (411 units) would be met by available inventory and developable residential lands in the City of Hood River and surrounding communities. Limited residential land in Hood River County. Demand on Hood River County housing (54 units) could contribute to projected housing deficit in the County by 5%.	Most of the additional demand for housing (198 units) would be met by available inventory and developable residential lands in the communities surrounding the Warm Springs Indian Reservation. However, Jefferson County does not have adequate residential land for the projected demand (22 units). The Warm Springs Indian Reservation has available residential land for the projected demand (63 units); however, housing on the reservation is limited due to lack of funding.	

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
Effects on Columbia River Gorge National Scenic Area lands	Potential use of 223 acres of undeveloped/forested tribal trust lands and fee lands in Hood River, consistent with allowable zoned uses.	Perpetual conservation easement on 223 acres of tribal trust and fee lands in Hood River; no loss of Forest, Public Recreation, or Open Space lands in the Columbia River Gorge National Scenic Area.	Conversion of 23 acres undeveloped/forested land in Columbia River Gorge National Scenic Area to commercial development; potential conversion of 175 acres of undeveloped/forested fee land to other allowable use (e.g., timber harvest, mining).	Conversion of 27 acres undeveloped/forested land in Columbia River Gorge National Scenic Area to commercial development; potential development on 175-acre fee-to-trust land in scenic area for development of casino-related facilities, timber harvest, or mining	Potential conversion of 223 acres of undeveloped/forested tribal trust lands and fee lands in Hood River, consistent with allowable uses (e.g., timber harvest, mining).
Water Resources					
Effects on water bodies	No effect	Herman Creek; in-water work would require the dewatering of Herman Creek, which could temporarily increase turbidity.	No effect.	Seep would be temporarily disturbed during construction for access to storm water/wastewater facilities. Small culverts would be installed under the temporary access road to allow flow from the seep to continue during construction.	Construction of utility lines crossing ephemeral drainage and parallel to Shitike Creek to occur during dry season and within existing roadbed.
Storm water discharge	None	Discharge of treated storm water: <ul style="list-style-type: none"> • >2-yr, 24-hr storm water from west parking lot to Herman Creek Cove • >25-yr storm water from resort/casino, north parking and parking structure to Government Cove • >72% of 2-yr, 24-hr storm water from interchange to Herman Creek and Dry Creek. 	Subsurface injection of treated storm water from casino building and related facilities.	Discharge of treated storm water: >25-yr storm water from casino building and related facilities to Columbia River.	Discharge of treated storm water: >25-yr storm water from casino building and related facilities to Shitike Creek.

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
Air Quality					
Effects from vehicular emissions	Emissions of primary pollutants expected to decline from current levels through 2028.	Emissions of primary pollutants would increase over No Action conditions; however, overall downward trend in pollutant emissions would continue regardless of the project.	Emissions of primary pollutants would increase over No Action conditions; however, overall downward trend in pollutant emissions would continue regardless of the project.	Emissions of primary pollutants would increase over No Action conditions; however, overall downward trend in pollutant emissions would continue regardless of the project.	Emissions of primary pollutants would increase over No Action conditions; however, overall downward trend in pollutant emissions would continue regardless of the project.
Biological Resources					
Amount of wildlife habitat/vegetation disturbed by construction activities	None	5 acres of riparian forest 17 acres of upland forest 4 acres of big leaf maple grove 106 acres nonnative plants or <u>impervious area</u> 132 acres total	2 acres of oak woodlands 17 acres of upland forest <u>4 acres nonnative plants</u> 23 acres total	3 acres of oak woodlands 19 acres of upland forest 0.3 acre of wetland 150 linear feet of seep <u>5 acres nonnative plants</u> 27+ acres total	Removal of nonnative grasses and weedy herbaceous species throughout most of the 36 acre project site.
Amount of wildlife habitat/vegetation permanently removed	None	4.6 acres of riparian forest 17 acres of upland forest 4 acres of big leaf maple grove 54 acres nonnative plants or <u>impervious area</u> 79.6 acres total	2 acres of oak woodlands 17 acres of upland forest <u>4 acres nonnative plants</u> 23 acres total	3 acres of oak woodlands 18 acres of upland forest 0 acre of wetland 0 linear feet of seep <u>5 acres nonnative plants</u> 26 acres total	36 acres of disturbed nonnative grasses and weedy herbaceous species.
Adverse effects on fisheries and aquatic resources	None	Construction would require in-water work at I-84 bridge over Herman Creek; channel to be isolated and fish moved. Temporary disturbance to bed and banks of Herman Creek. Small permanent loss of aquatic habitat in Herman Creek where the I-84 bridge piers would be located. This would have no effect on fish passage, migration, spawning, or rearing.	None.	Construction would require in-water work at pond (no fish present) and seep; no impact to fish or aquatic species anticipated.	In-water work would be avoided; no impact anticipated.

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
Adverse effects on protected species	None	Construction at I-84 bridge over Herman Creek would adversely affect Lower Columbia River Chinook, coho and steelhead, and their critical habitats. Displacement of fringed myotis (bats) during construction of I-84 bridge over Herman Creek. Construction activities may temporarily disturb bald eagle, spotted owl, and state sensitive bird and aquatic species near the project site. No long-term adverse effects on any of these species are expected. (Effects determination and mitigation requirements for federal listed species pending concurrence through Section 7 consultation with USFWS and NMFS.)	Construction blasting would temporarily disturb bald eagle foraging habitat within 1 mile and could disturb activity at nearby nest site. No long-term adverse effects to bald eagle are expected. Construction activities would temporarily disturb state sensitive bird species near the project site. No long-term adverse effects on these species are expected. (Effects determination and mitigation requirements for federal listed species pending concurrence through Section 7 consultation with USFWS.)	Construction blasting would temporarily disturb bald eagle foraging habitat within 1 mile and could disturb activity at nearby nest site. No long-term adverse effects to bald eagle are expected. Construction activities would temporarily disturb state sensitive bird, amphibian, and reptile species near the project site. No long-term adverse effects on these species are expected. (Effects determination and mitigation requirements for federal listed species pending concurrence through Section 7 consultation with USFWS and NMFS.)	No short-term or long-term effects on protected species.
Historic, Archaeological, and Cultural Resources					
Effects on historic, archaeological and cultural resources	None	1,400 linear feet of Historic Columbia River Highway disturbed. Finding of no adverse effect on the highway with conditions to protect the integrity of the resource. The Young powerhouse would be partially disturbed or destroyed by construction activity. Other known archaeological resources would be avoided. No effects to identified cultural resources.	Direct adverse effect from casino traffic on 450-foot segment of Historic Columbia River Highway in area designated as National Historic Landmark. Indirect adverse effect from casino access road (traffic noise, vehicle exhaust, over-crossing), and visual intrusion of casino building on 5,200-foot segment of Historic Columbia River Highway. No known archaeological resources at project site. No effects to identified cultural resources.		Eleven cultural sites, in the US 26 corridor would be affected by construction activities. Visual intrusion at cemetery site.

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
Socioeconomics					
Projected net job growth in the project study area/region					
<i>Direct jobs</i>	None	856	416	152	
<i>Indirect jobs</i>	None	330	160	58	
<i>Induced jobs</i>	None	1,075	522	190	
Adverse effects on utilities	None	None	None		Water treatment plant is at capacity; conservation measures in community of Warm Springs or plant upgrade would be needed to support new casino.
Adverse effects on public services	None	Demand of fire and police services would increase. Revenue from a Community Benefit Fund would help meet this demand. Emergency response time to Cascade Locks from the east would increase (due to interchange ramp closure).	Demand of fire and police services would increase. Revenue from a Community Benefit Fund would help meet this demand.		Fire services would be incapable of meeting the demand of a new facility. Revenue from a Community Benefit Fund would help meet this demand.
Effects to local businesses	None	Increased travel time and unfamiliar route to downtown Cascade Locks may have a temporary adverse effect by decreasing number of visitors to businesses downtown. Potential long-term benefit from increased visitation and demand for tourism-related services.	Potential long-term benefit from increased visitation and demand for tourism-related services.		Potential long-term benefit from increased visitation and demand for tourism-related services.

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
Resource Use Patterns					
Increased use of existing recreation facilities	None.	Potential increase of 3.5% to 6.5% in annual visitors to the Columbia River Gorge National Scenic Area. This represents a minor effect on recreation resources. Increased use of available recreational facilities within study area.	Potential increase of 2.0% to 3.6% in annual visitors to the Columbia River Gorge National Scenic Area. This represents a minor effect on recreation resources. Increased visits to Mark O. Hatfield Trailhead and Visitors' Center and Mosier Twin Tunnels trail.		Potential increase of 19,500 to 38,000 visitors to recreation sites could occur annually in Central Oregon. This represents a minor effect on recreation resources. Increased visits to local recreational facilities, e.g., Museum at Warm Springs.
Change in resource extraction	None.	Depletion of Port of Cascade Locks quarry; no effect on availability of aggregate materials in the region; Hood River trust and fee lands no longer available for resource extraction.	Use of trust and fee lands by tribal members would be inhibited by development; potential use of undeveloped portions of trust and fee lands for resource extraction (timber harvest, mining), consistent with tribal (trust lands) and local (fee lands) zoning.	Use of trust and fee-to-trust lands by tribal members would be inhibited by development; potential use of undeveloped portions of trust and fee-to-trust lands for resource extraction (timber harvest, mining), consistent with tribal zoning.	Gravel extraction from the site would no longer be possible.
Transportation Networks					
Construction-related traffic	None.	614 off-peak vehicle trips for construction workers to/from the site; 45 truck trips on typical work days; 45 concrete delivery trucks on days when concrete is poured. Most truck delivery trips are expected to occur in the morning.	307 off-peak vehicle trips for construction workers to/from the site; 432 truck trips per day during excavation/removal; 23 truck trips during typical work days; 23 concrete delivery trucks on days when concrete is poured. Most truck delivery trips are expected to occur in the morning.		115 off-peak vehicle trips for construction workers to/from the site; 10 truck trips on typical work days.

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
2028 Estimated Daily Traffic Volume	<p><u>Cascade Locks</u> I-84 west of Cascade Locks: 34,000 Forest Lane: 2,000</p> <p><u>Hood River</u> I-84 west of Exit 63: 30,000 OR 35: 13,000</p> <p><u>Warm Springs</u> US 26 in Warm Springs: 11,000</p>	<p>I-84 west of Cascade Locks: 42,000</p> <p>Forest Lane: 3,000</p>	<p>I-84 west of Exit 63: 34,000 OR 35: 19,000</p>		<p>US 26 in Warm Springs: 12,000</p>
Traffic conditions at study area intersections during peak study hour (Sunday afternoon 4-5PM) using 2028 projections	<p><u>Cascade Locks</u> Intersections at both ends of Bridge of the Gods fail; All others have slight delay.</p> <p><u>Hood River</u> Jammed traffic at State St/OR 35, Oak St/Second St, Cascade Ave/Second Ave; All others have acceptable or tolerable delay.</p> <p><u>Warm Springs</u> Jammed traffic at Paiute St/US 26 and US 26/US 97 South jct; acceptable delay at US 26/US 97 North jct.</p>	<p>Intersections at both ends of Bridge of the Gods fail. All others have slight delay.</p>	<p>Jammed traffic at State St/OR 35, Oak St/Second St, Cascade Ave/Second Ave. All others have acceptable or tolerable delay.</p>		<p>Jammed traffic at Paiute St/US 26 and US 26/US 97 South jct; acceptable delay at US 26/US 97 North jct. All others have acceptable or tolerable delay.</p>
Traffic effects during peak study hour (Sunday afternoon 4-5PM) on interstate or statewide facilities (using 2028 projections) relative to ODOT standards	<p><u>Cascade Locks</u> All westbound study segments on I-84 operate unacceptably.</p> <p><u>Hood River</u> Acceptable at all locations.</p> <p><u>Warm Springs</u> Unacceptable at US 26/US 97, North jct and South jct.</p>	<p>All westbound study segments on I-84 operate unacceptably.</p>	<p>Unacceptable at Exit 63/Exit 64 westbound weave section.</p>		<p>Unacceptable at US 26/US 97, North jct and South jct.</p>

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
Compliance with interchange and intersection (Division 51) spacing standards	Existing interchanges do not meet spacing standards; however, interchanges were built before standards were developed.	Would not meet interchange spacing standards, although ramp closures at adjacent interchanges would bring Cascade Locks interchanges closer to meeting standards; Forest Lane/loop road intersection would not meet Division 51 spacing standards, but would be within 40 feet.	No modification to interchange proposed; casino access road complies with Division 51 spacing standards.		Would not meet interchange spacing standards.

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
Infrastructure improvement needs to meet traffic demand and safety requirements	<p><u>Cascade Locks (from the City's Transportation System Plan):</u></p> <ul style="list-style-type: none"> • New east-west roadway south of I-84 that would connect the west end of WaNaPa Street with the west end of the Frontage Road (at the East Cascade Locks Interchange). • New interchange on I-84 at the existing Forest Lane overcrossing. • New access to Port of Cascade Locks Industrial Park. • New traffic signal at the WaNaPa Street/Bridge of the Gods intersection. <p><u>Hood River (from the Hood River County Transportation System Plan):</u></p> <ul style="list-style-type: none"> • Construct signal/intersection improvements at intersection of OR 35 with I-84 and the Historic Columbia River Highway. <p><u>Warm Springs (from the Madras and Jefferson County Transportation System Plans):</u></p> <ul style="list-style-type: none"> • Planned Madras truck by-pass with intersection improvements to US 26/US 97 North jct and new interchange at US 26/US 97 South jct. 	<ul style="list-style-type: none"> • New interchange on I-84 at the existing Forest Lane overcrossing. • Ramp closures: Herman Creek Interchange westbound off-ramp and eastbound on-ramp; East Cascade Locks Interchange westbound off-ramp. • New access to the Port of Cascade Locks Industrial Park – loop road that climbs and crosses over Forest Lane. • Relocation of Forest Lane/Frontage Road intersection farther west. • Transportation Demand Management (TDM) measures to reduce impact on westbound I-84. 	<ul style="list-style-type: none"> • New casino access road that would connect with the Historic Columbia River Highway east of the State Street/OR 35 intersection. • Improvements to OR 35/historic highway intersection to accommodate increased traffic. • TDM measures to reduce impact on westbound I-84 weave between Exits 64 and 63. 	<p>New interchange with US 26 at casino access point to meet safety requirements.</p>	

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
Noise					
Number of noise-sensitive (residential) receptors adversely affected by increased traffic noise (projection for 2028)	<p><u>Cascade Locks</u> 30 noise-sensitive receptors (representing 42 residences).</p> <p><u>Hood River</u> None.</p> <p><u>Warm Springs</u> None.</p>	34 noise-sensitive receptors (representing 47 residences).	6 noise-sensitive receptors (representing 6 residences).		None.
Scenic Resources					
Visibility from key views (low/medium/high)	Not applicable	Low to medium – Due to the large number of viewers and the change from lightly developed/undeveloped to developed.	Medium to high – Due to the highly visible location of the site and the change from undeveloped to developed.		Not applicable.
Changes to existing visual conditions	Not applicable	<p>There would be a major change in the view from I-84 westbound and eastbound. Travelers would view the addition of a new, large development on a site that is currently undeveloped and surrounded by diffuse, industrial development; a new transportation facility in place of mature trees between I-84 and Frontage Road. Viewing time would be short considering travel speeds on I-84 and how topography limits views.</p> <p>The development of the project site would result in a minor change in the view of the site from Washington.</p>	<p>The project would introduce a large built feature into a relatively natural appearing undeveloped area, resulting in increased visibility of human-made elements and an adverse impact to the visual quality of the site and surroundings.</p> <p>The development of the site would be visually dominant from key viewing areas (Historic Columbia River Highway, SR 14, the Columbia River).</p> <p>The proposed access road would represent a new structure visible from the Historic Columbia River Highway (a key viewing area).</p>		<p>The project would result in a substantial visual change to the alternative site and surroundings. New development, including a relatively large building and surface parking, would be introduced to a site that is currently undeveloped where there are broad, open views of the surrounding undeveloped landscape. Adverse visual impact on cultural property (cemetery).</p>

Table 2-1: Comparison of Alternatives

	No Action Alternative ¹	Cascade Locks Resort and Casino Project	Hood River Alternative Option A	Hood River Alternative Option B	Warm Springs Alternative
Hazardous Materials					
Probability that hazardous materials would be encountered during construction (low/moderate/high)	Low	Low	Low	Low	Moderate

¹ A plausible outcome of the No Action Alternative would be the Tribe's decision to pursue development of a casino on trust land east of Hood River. The environmental effects of such a development are evaluated as the Hood River Alternative, Options A and B.

² Amount from Kah-Nee-Ta casino contributed in 2004 to the Tribe for government operations.

³ According to The Confederated Tribes of the Warm Springs Reservation of Oregon, Response to Request for Information related to Section 20(b)(1)(A) of the Indian Gaming Regulatory Act (August 15, 2005), the Tribe's "Adjusted Governmental Needs" unmet by current revenues is approximately \$26 million per year and is expected to increase (Appendix A).

⁴ The Tribe asserts a right of access to the trust land that falls within the savings provisions of the Columbia River Gorge National Scenic Area Act (Section 16 USC 5440[a][1]); however, the Forest Service contends that the access road would be subject to consistency review. See Section 4.2.3.