

NCTCA

NORTHERN CALIFORNIA TRIBAL CHAIRPERSONS ASSOCIATION



February 14, 2023

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EXECUTIVE SECRETARIAT



Bue Lake Rancheria

Secretary Deb Haaland
United States Department of the Interior
1849 C. Street, N.W.
Washington, DC 20240



Elk Valley Rancheria

RE: Coquille EIS



Hoopa Valley Tribe

Dear Secretary Haaland,



Karuk Tribe

Please accept this letter on behalf of the Northern California Tribal Chairperson's Association (NCTCA). The NCTCA opposes the proposal by the Coquille Indian Tribe to construct a new gaming facility in Medford Oregon. This proposal is being considered under a deeply irregular process which disregards congressional intent, negatively impacts a number of Tribes located in the region, and could set a damaging precedent by allowing gaming a vast distance from the Coquille Indian Tribe's existing reservation and gaming facilities. NCTCA urges you to reject the proposal on these grounds and respect the views of the Tribes already located within that region.



Redding Rancheria



Tolowa Dee-ni' Nation

The Coquille Indian Tribe currently operated a Class III gaming facility in North Bend, Oregon. The Tribe's administration, cultural, healthcare, education and housing offices are all located within Coos and Curry Counties. However, the new facility proposed by Coquille would be located approximately 170 miles away in Medford Oregon.



Trinidad Rancheria



Wiyot Tribe

The Coquille Restoration Act, enacted in 1989, authorized the Secretary to take into trust property in Coos and Curry Counties and identifies those counties and the Coquille Service Area. This Act also include Douglas, Jackson, and Lane Counties in Oregon as part of the Coquille service area, but notably did not direct the Secretary to take land into trust in those counties. NCTCA supports the right of Tribal Governments to provide services to member wherever they are located, however, the ability to provide services does not equate to a right to have land taken into trust for gaming.



Yurok Tribe



Resighini Rancheria

The Coquille proposal not only exceeds congressional intent as expressed in the Coquille Restoration Act, but it would negatively impact existing Tribal gaming facilities in the region. The Coquille Draft Environmental Impact Statement clearly identifies substantial revenue losses to 11 existing Tribal gaming facilities, impact which will damage the ability of those Tribes to provide key services to their members. Three of these gaming facilities would experience revenue declines well able 10%, upending the economic factors considered when Tribes made the decision to construct them. The negative impacts to these



Quartz Valley



Big Lagoon Rancheria



Pitt River Tribe

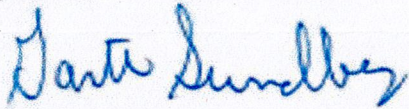


Susanville Rancheria

existing facilities would result in decreased employment and harm the economies of local governments.

Rather than a natural expansion of trust lands in the area in which Coquille is located, the Medford gaming proposal is an effort to secure a more economically advantageous location. The Department has rightly viewed such proposals skeptically in the past, recognizing that allowing decisions to be made based upon purely economic factors would negatively impact Tribal gaming economies across the nation. NCTCA urges you to withdraw the Coquille Draft EIA, maintain the Department's existing processes and procedures, and reject this proposal.

Sincerely,



Garth Sundberg
NCTCA Chairman

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