



The Confederated Tribes of the Grand Ronde Community of Oregon

Umpqua Molalla Rogue River Kalapuya Chasta

Tribal Council
Phone (503) 879-2301
Fax (503) 879-5964

1-800-422-0232
9615 Grand Ronde Road
Grand Ronde, Oregon 97347

February 23, 2023

Bryan Mercier, Regional Director
Bureau of Indian Affairs, Northwest Region
911 NE 11th Avenue
Portland, Oregon 97232-4169

*sent via electronic mail to:
CoquilleCasinoEIS@bia.gov*

Re: DEIS Comments, Coquille Indian Tribe Fee-to-Trust and Gaming Facility Project

Dear Mr. Mercier:

The Confederated Tribes of the Grand Ronde Community of Oregon (“Grand Ronde”) respectfully submits the following comments to the Draft Environmental Impact Statement (“DEIS”) for the Coquille Indian Tribe Fee-To-Trust and Gaming Facility Project (“Medford Casino”).

Grand Ronde’s Interest in the Medford Area and Proposed Medford Casino.

Historical and cultural connections. The Takelma, Upper Takelma, and Latgawa Tribes historically inhabited and used the Medford area. These tribes signed the 1853 and the 1854 Treaties with the Rogue River.¹ Many of their members were removed to the Grand Ronde Reservation. Today, Grand Ronde annually conducts a community meeting with Medford-area residents, governments, and non-governmental organizations. Table Rocks, northeast of Medford, is sacred to Grand Ronde members and is regularly used for cultural purposes. Grand Ronde has a Memorandum of Understanding with the Bureau of Land Management and Nature Conservancy for the protection and management of Table Rocks.

Indian gaming under the Indian Gaming Regulatory Act. Grand Ronde supports casino gaming by all Oregon tribes on their reservations. The development of second casinos off reservation, closer to urban populations, will demand that Oregon tribes, whose on-reservation casinos are impacted, seek their own off-reservation casinos. This competition to locate casinos in more profitable locations will significantly damage tribes’ on-reservation, casino-based economies.

Support for the Principle of One On-Reservation Casino per Tribe.

Grand Ronde supports the principle of one on-reservation casino per Tribe. The DEIS projects that the Cow Creek Band of Umpqua Indians will lose 25% of its projected 2023 gaming revenue, the Karuk Tribe will lose 27.2% of its revenue, and the Klamath, Modoc & Yahooskin Tribes will lose 16.1% of its revenue.² These are devastating losses. We expect they would have significant impacts

¹ Treaty with the Rogue River, 1853, Sept. 10, 1853, 10 Stat. 1018 and Treaty with the Rogue River, 1854, Nov. 15, 1854, 10 Stat. 1119.

² See DEIS at 4-23.

Mr. Bryan Mercier
February 23, 2023
Page 2

on these tribes' ability to provide critical services to their members. Even the modest projected impact on Grand Ronde would have consequences for us.

While we respect the need of the Coquille Tribe for additional revenue, meeting that need should not come at the cost of devastating impacts on other tribes.

The DEIS states:

Estimated substitution effects are anticipated to diminish after the first year of the project operations because local residents will have experienced the casino and will gradually return to more typical and more diverse spending patterns.³

This conclusion is not consistent with Grand Ronde's experience. Grand Ronde endured the hardship of a new casino entering its gaming market. In Grand Ronde's case, a substantial number of patrons, and the revenue that would have been earned from them, were permanently lost to the new casino, despite marketing and incentive programs aimed at retaining them.

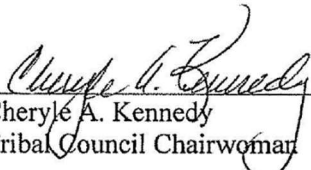
The DEIS further states

It is estimated that revenues would rebound to projected 2023 levels within 16.1 years at the Cow Creek Band's gaming facility, within 28.1 years at the Karuk Tribe's gaming facility, and within 12.3 years at the Kla-Mo-Ya facility.⁴

In other words, in 2051, the Karuk Tribe's revenues will return to a 2023 level. This is a staggering loss of revenue to the Karuk Tribe. We can only imagine what an impact this would have to Karuk's programs for its members. Moreover, projecting revenue recovery over many years, especially after a large initial revenue loss, ignores whether Karuk's casino could sufficiently meet its fixed operational costs and continue in business.

These devastating impacts on other Tribes are unacceptable. Grand Ronde opposes federal action which would enable the construction of the proposed Medford casino. A policy of one casino per tribe on reservation land is the best policy for Oregon tribes.

Very truly yours,


Cheryl A. Kennedy
Tribal Council Chairwoman

cc: Tribal Council
Chief of Staff
Tribal Attorney

³ DEIS at 4-22.

⁴ *Id.*