



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAR 03 2014

Mr. Franklin Keel
Regional Director
Eastern Regional Office
Bureau of Indian Affairs
545 Marriott Drive, Suite 700
Nashville, Tennessee 37214

Dear Mr. Keel:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement (FEIS) for the Proposed Stockbridge-Munsee Casino in the Town of Thompson, Sullivan County, New York, in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C. 7609, Pl. 91-604 12(a), 84 Stat. 1709), and the National Environmental Policy Act (NEPA).

The Stockbridge-Munsee Tribe proposes to establish a casino gaming operation on several parcels that comprise 330 acres in Sullivan County, New York, located adjacent to both County Road 161 and State Route 17. These parcels will be taken into trust for the Tribe by the Bureau of Indian Affairs. The proposed project will be constructed in two phases. Phase I consists of a main facility approximately 584,000 square feet that includes 3,000 slot machines, 190 gaming tables, specialty bars and restaurants, retail, children's areas, multi-purpose area, employee area, and back of house. Warehousing and storage will be provided in a separate building located at the southern end of the site. A service station, convenience store, and water tower will be located at the entrance. A 40,000 square foot central plant will be located east of the casino. For Phase I, a total of 8,480 parking spaces will be provided in both surface lots and structured parking. Phase II consists of expanded gaming, a 750-room hotel adjacent to the gaming facility, and a hotel parking garage providing 1,020 spaces.

The FEIS adequately responds to EPA's March 28, 2005, comments regarding wetlands, surface water, air quality, construction of water and wastewater infrastructure, and cumulative impacts of multiple casinos. EPA appreciates the information on solid waste included in the FEIS, but would like to take the opportunity to identify related resources that can benefit both construction and operation of the casino complex:

- **EPA's Sustainable Materials Management (SMM) Program** offers guidance on incorporating life cycle impacts into purchasing decisions, using less toxic and more renewable materials, and increasing industrial materials recycling. Through SMM, companies can conserve natural resources, make significant contributions to reductions in greenhouse gases, and even improve their bottom lines. Information on this program can be accessed at www.epa.gov/smm.

- **Sustainable Food Management and EPA's Food Recovery Challenge** provide opportunities to reduce waste and disposal fees while supporting local communities by feeding families that are food insecure. Information on the Food Recovery Challenge can be accessed at <http://www.epa.gov/epawaste/conserve/smm/foodrecovery/index.htm>.
- **New York State's Beyond Waste Plan** is a model for municipal solid waste management plans across the U.S., and also serves as a guide to many industry sectors in New York that are required to manage solid waste. The plan can be accessed at <http://www.dec.ny.gov/chemical/41831.html>.

Thank you for the opportunity to comment on the FEIS. If you have any questions, please contact Shane Nelson at (212) 637-3130.

Sincerely yours,

A handwritten signature in cursive script that reads "Judy-Ann Mitchell". The signature is written in black ink and is positioned above the printed name and title.

Judy-Ann Mitchell, Chief
Sustainability and Multimedia Programs Branch