

Good evening. My name is Robert Kecskes, and I am a private environmental consultant from 354 Pennington-Rocky Hill Road in Pennington, New Jersey.

I have over 40 years of experience in water issues. I was employed by the New Jersey Department of Environmental Protection for 35 years, which includes 25 years as the chief of water supply planning.

I have been retained by the Sterling Forest Partnership to evaluate the Draft Environmental Impact Statement for the proposed Sterling Forest Resort Casino. The comments that I will make tonight represent my own observations of the project.

Based on my review, I would respectfully urge the Town Board to reject the Impact Statement because it ignores several key problems that would result if the casino were built. Let me start with the impacts that it would have with the residents of Tuxedo and work my way downstream.

First, the casino relies on an estimate of water availability from the Indian Kill Reservoir that is factually outdated and is almost certainly overestimated. The water availability estimate made for the reservoir is 60 years old. Water availability is based on the drought of record. There have been numerous severe droughts in the past 60 years. These droughts have not been assessed to determine how much water is actually available from the reservoir. It is quite possible that both the casino and the Tuxedo residents served by the reservoir could run out of water if a severe drought occurs in the future. None of this possibility was presented in the Impact Statement.

Second, no assessment was made of how the residents of Tuxedo that use the reservoir as a source of water will be affected during future drought. Water use restrictions during drought are based on reservoir levels. Once in operation, the casino will use a large portion of water in the reservoir, and cause water levels to decline significantly more than present. Consequently, these residents will experience water use restrictions more frequently and for longer periods of time in the future. Not a peep of this was addressed in the Impact Statement.

Third, the Impact Statement gives the impression that the reservoir's water quality will not be affected by the casino. That's absurd. The salt spread during the winter so that the casino can continue to operate will make its way down to the impoundment, as will the oil, transmission fluid, and antifreeze from the new traffic on 17A and the parking lots. Pesticides, herbicides, and fertilizer applied to the lawns will make their way down to the reservoir. An accidental spill of hazardous chemicals is always possible.

Fourth, the casino will use large amounts of water from the Ramapo River watershed, but not return it because of its consumptive irrigation and cooling water uses. This means that there will be less water flowing in the Ramapo River in the future. The United Water New York Ramapo Valley well field that provides more than a third of Rockland County's water supply is required to cease pumping when certain low flows occur. The casino's consumptive water uses will cause these flows to be prematurely reached, directly resulting in a loss of water supply to Rockland County. Not a word of this impact was discussed in the document.

Fifth, the casino's consumptive water uses will result in a loss of dilution in the Ramapo River. This river is presently comprised of a large fraction of wastewater during periods of low precipitation. The Ramapo River recharges the Ramapo Valley wells during these periods. Thus, more of this recharged water will be wastewater during these periods, and additional and expensive water treatment equipment may be required. No mention of this was described in the Impact Statement.

Sixth, the same applies to the towns in New Jersey that have wells along the river. The casino will result in more of their water supplies being converted to larger fractions of wastewater. Again, the document was silent on this impact.

Seventh, the North Jersey District Water Supply Commission and United Water New Jersey have a pump station on the Ramapo River that is an extremely important part of their water supplies. This pump station must not be used during periods of low flow. The casino's consumptive uses and consequent reductions in flow in the Ramapo River will shut this pump station down earlier, thereby resulting in a loss of supply to these major purveyors. Not a word of this in the Impact Statement.

Eighth, and last, the combined effects on local and regional environmental resources of the numerous proposed and planned activities beyond the proposed casino were not addressed. The cumulative and synergistic effects of the proposed Caesar's Casino, the proposed Tuxedo Reserve, etc., will be not understood because of the "project level" or "one project at a time" approach taken by the applicant. These cumulative effects will exacerbate many of the impacts that were just mentioned. Both informed decision making and

adequate protection of people, communities, and the environment are undermined when cumulative impacts are ignored. No attempt was made in the Impact Statement to assess these effects taken as a whole.

Based on these shortcomings, I respectfully recommend that the Tuxedo Town Board deny the Impact Statement as incomplete.