



EXHIBIT X.C.4. STORM WATER

Submit as Exhibit X.C.4. a description of plans for management of storm water including any plans to use Institute for Sustainable Infrastructure techniques to minimize impact of storm water and maximize its reuse.

The management of storm water was a key factor influencing the development of the master plan for Adelaar. As the NYSDEC regulates storm water discharges associated with construction activity, management practices are required to be implemented to achieve water quality, water quantity and pollution prevention control goals. These practices are required to be developed and detailed to show compliance with NYSDEC standards in site specific Storm Water Pollution Prevention Plans ("SWPPP"). Complete SWPPPs have already been prepared for both Montreign Resort Casino, as well as for the roadway infrastructure required to serve Adelaar. They incorporate strategies to reduce



run-off, maintain natural drainage patterns and discharge locations, and regulate the rate of discharge to receiving waters. Conceptual storm water management planning has also been developed for the Indoor Waterpark Lodge and the Entertainment Village. Additionally, flood mitigation strategies are included in the redesign of the Monster Golf Course, even though they are not required.

Montreign Resort Casino

A SWPPP was developed in March 2013 for Montreign Resort Casino. (Attachment VIII.C.17.a.-1 to Exhibit VIII.C.17.a.) The SWPPP details the structures, techniques and materials that will be used to manage the

storm water generated at the site. As shown on Figure 5 of the SWPPP, the site will use a combination of storm water ponds, bio retention areas, vegetated swales, porous pavement and grass pavers to mitigate the storm water impacts of Montreign. Computations which show compliance with green infrastructure and run-off reduction practices are detailed in Appendix G of the SWPPP. These improvements will be built during the construction of Montreign and will be fully operational prior to its opening.

The storm water improvements for Montreign have already been approved by the Town of Thompson and NYSDEC in conjunction with the Site Plan approval granted on July 10, 2013, and a minor amendment to the Site Plan approved on June 11, 2014. The only condition placed on the approval of these improvements was that the applicant obtain and adhere to all requirements of the State Pollutant Discharge Elimination System General Permit.

Entertainment Village, Indoor Waterpark Lodge, Monster Golf Course, Infrastructure Improvements

Indoor Waterpark Lodge and Entertainment Village

Storm water run-off from the Indoor Waterpark Lodge and the Entertainment Village will be managed on-site as detailed within the site specific SWPPP, which will be prepared. As the design of the Indoor Waterpark Lodge and the Entertainment Village are not yet final, precise storm water management techniques and locations have not yet been chosen. However, EPR expects that the final design will incorporate NYSDEC mandated run-off reduction strategies to minimize impervious surfaces and utilize green infrastructure practices. These storm water management techniques will be an integral part of the overall site design and will be constructed during the development of the Indoor Waterpark Lodge and the Entertainment Village and will be fully operational prior to their opening. The Town of Thompson Planning Board will have to approve the final storm water management techniques during site plan approval. As the storm water impacts of development were already the subject of a Generic Environmental Impact Statement, EPR does not expect that the Town of Thompson will place any conditions on the use of these techniques other than the applicant obtaining and adhering to all requirements of the State Pollutant Discharge Elimination System General Permit.

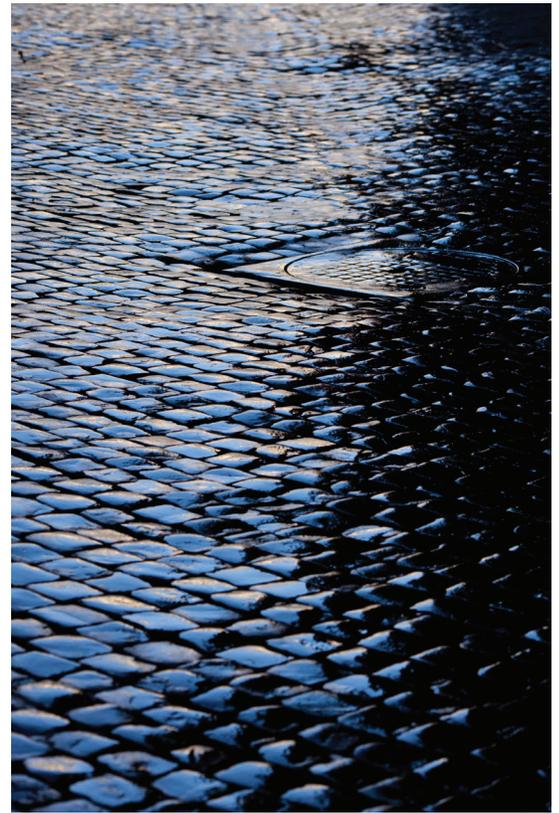
Monster Golf Course

The development of the re-designed Monster Golf Course will not include the development of large areas of new impervious area. The alteration of the play area will include the re-alignment and re-grading of the existing course, as well as the building of a new clubhouse and maintenance building. Therefore, no significant storm water impacts are anticipated from the development of the Monster Golf Course and no significant storm water management techniques will be required.

Infrastructure Improvements

A SWPPP was developed in March of 2013 for the significant roadway improvements being installed as part of the Gaming Facility. (Attachment VIII.C.17.a.-2 to Exhibit VIII.C.17.a.) These improvements are extensive and include improvements to the Route 17 Exit 106 interchange area, the construction of the new Resort Entry Road, and the widening and reconstruction of existing town roads. A site specific SWPPP was prepared for these work areas and it details the structures, techniques and materials that will be used to satisfy governing water quality and quantity requirements. Computations which show compliance with green infrastructure and run-off reduction practices are detailed in Appendix G of the SWPPP. As shown in Figures 4a and 4b of the SWPPP, the site will use a combination of storm water

ponds, bio retention areas, vegetated swales, porous pavement and grass pavers to mitigate the storm water impacts of these roadways. In addition, the disturbance limits were carefully designed to minimize extraneous clearing of existing vegetation and forest. These improvements will be built during the construction of the roadway improvements, and will be fully operational prior to their opening. Both the NYSDEC and the Town of Thompson Planning Board has approved the SWPPP in conjunction with the final Site Plan approval.



THE SITE WILL USE A COMBINATION OF STORM WATER PONDS, BIO RETENTION AREAS, VEGETATED SWALES, POROUS PAVEMENT AND GRASS PAVERS TO MITIGATE THE STORM WATER IMPACTS