

**A. INTRODUCTION**

EPT Concord II, LLC (referred to as “EPT” or the “Applicant”) proposes to develop a master planned destination resort community (referred to as “EPT Concord Resort”) on approximately 1,538 acres of land located in the Town of Thompson (the “Project Site”), Sullivan County, New York. When complete, the EPT Concord Resort will include an 18-hole golf course, Casino Resort, harness horse racetrack, grandstand/showroom, simulcast facility, hotels, an RV park, and an entertainment village with cinemas and supporting retail. In addition, there will be a residential village with a mix of unit types including condos, apartments, townhouses and detached single family homes, a civic center, an innovative health care facility, and an active adult residential community. This mix of uses will be connected via a multi-use trail system with abundant open space.

Upon completion, the Proposed Project is anticipated to support approximately 2,642 permanent full-time equivalent (FTE) jobs. The direct economic activity is anticipated to generate an additional 1,229 indirect and induced jobs within Sullivan County and an additional 1,505 indirect and induced jobs within New York State.

To develop the EPT Concord Resort, the Applicant has initiated several actions. First, the Applicant has petitioned the Town Board of the Town of Thompson for an amendment to the Town of Thompson Planned Resort Development (“PRD”) section of the zoning law (Town Code § 270-27.2) to enable the development of the EPT Concord Resort at the site of the former Concord Resort (“Proposed Action”). The amended zoning law will apply to the entire PRD district, which is comprised of approximately 1,735 acres.<sup>1</sup>

Second, the Applicant seeks approval from the Town Board for a new PRD Comprehensive Development Plan (“CDP”) for the approximately 1,538-acre Project Site (“Proposed Project”). The approval of the CDP is contingent on the adoption of the proposed zoning amendment.

Third, the Applicant seeks Site Plan Approval from the Town of Thompson Planning Board for the first phase development of the Proposed Project (“Phase 1”) that will include the Casino Resort complex at the Resort Core.<sup>2</sup> This phase is anticipated to include a casino, hotel, harness

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<sup>1</sup> When the PRD Zoning Law was adopted in 2006, the entire 1,735± acre property within the PRD zoning district was owned or controlled by Concord Associates, LP and/or its affiliates (“CALP”). In November 2006, the Town Board approved a Comprehensive Development Plan (“CDP”), a requirement of the PRD, for the 1,735± acres owned or controlled by CALP. That CDP was later amended by CALP to include a casino and harness horse racetrack. In June 2010, CALP, without completing any phases of construction, deeded ownership and control over the majority of land (approximately 1,538 acres) within the PRD zoning district and CDP to the Applicant.

<sup>2</sup> See Concept Master Plan within Proposed Comprehensive Development Plan, included in Appendix A-2.

horse racetrack, grandstand/showroom, simulcast facility, banquet event center, restaurants, and related facilities (“Casino Resort”). The Applicant intends to begin construction of Phase 1 by the end of 2012, pending the receipt of the necessary permits, approvals and necessary financing.

After the receipt of site plan approval for Phase 1, the Applicant will finalize design review details for the golf course program and select components of the entertainment village at the Resort Core. These additional development program components will promote increased attendance at the Casino Resort complex and are anticipated to be completed in 2014, concurrent with the completion of Phase 1. In 2014 with the completion of Phase 1, the golf course program and select components of the entertainment village at the Resort Core, it is anticipated that 1,143 new FTE jobs will be created.

This Draft Generic Environmental Impact Statement/Draft Environmental Impact Statement (DGEIS/DEIS) has been prepared pursuant to the requirements of the State Environmental Quality Review Act (SEQRA) (Article 8 of the Environmental Conservation Law and its implementing regulations at 6 NYCRR 617). The purpose of this DGEIS/DEIS is to provide an objective analysis of the potential environmental impacts of the Proposed Action, the Proposed Project and Phase 1 in all phases of construction and operation, including Phase 1. Subsequent phases of the Proposed Project will be subject to site-specific environmental review as required by SEQRA.

Areas of study to be addressed in this DGEIS/DEIS were identified by the Town Board of the Town of Thompson, acting as Lead Agency under SEQRA, in the Scoping Document adopted on April 17, 2012. A copy of the adopted Scoping Document is included in Appendix A-1.

This Chapter describes the Purpose and Need, Project Site History, Project Site Description and Setting, Components of the EPT Concord Resort Project, Environmental Reviews and Permits, and the Involved and Interested Agencies.

## **B. PURPOSE AND NEED**

Development in Sullivan County and on the EPT Concord Resort site in particular has stagnated in recent years. The lack of job creation has added to the decline in the local market, some properties have fallen into disrepair, and tourism has waned with the compounding effect of discouraging further growth. EPT proposes to counter this trend by developing the 1,538-acre site of the former Concord Resort into a world-class, four-season destination resort and multi-use residential community. This endeavor will reclaim this significant property and reverse this downward spiral. The Proposed Project has the potential to have a transformational impact on established patterns of employment, development and investment in the area. At full build out, the EPT Concord Resort is estimated to create in excess of 2,600 FTE jobs, while revitalizing the local economy. The proposed EPT Concord Resort will be uniquely positioned to leverage existing infrastructure and public investment to construct and reestablish the legacy of the former Concord Resort with an integrated resort destination firmly rooted in its local community and its physical and fiscal landscape. The purpose of this Proposed Project is to act as a catalyst for the area by providing a market-driven modern-day resort destination in the tradition of the beloved historical properties of yesteryear that made this region famous.

The proposed CDP for the Project Site is consistent with stated goals within local and regional planning documents and the Town of Thompson zoning law. The *Town of Thompson/Village of Monticello Comprehensive Plan* (1999) (the “Town/Village Plan”) identified major resort areas as a catalyst for redevelopment and renewal. The Town/Village Plan states:

*“...providing for land uses such as the Concord Resort Hotel is necessary to preserve major employment centers and preserve a source of attraction to the Town and region. The number of major resorts has dwindled and those which remain should be protected from incompatible adjacent land uses and permitted to expand and develop, provided those development plans maximize the protection and enjoyment of the Town's natural resources on which the bulk of the tourism industry depends.”*

The Town Code §250-27.2 A(1) specifically incorporates the goals of the Town/Village Plan.

Sullivan County's Strategic Plan, *Sullivan 2020 Defining an Image and Managing Change*, adopted in 2005, states various economic development goals for municipalities within the County, including promoting:

- *A diversified economy;*
- *A broad based economic marketing identity that reaches beyond the County borders;*
- *A balance between preserving the agricultural economy of the County and allowing growth and development in the rural areas primarily through innovative, progressive implementation techniques, such as promoting cluster development;*
- *Clean industry is promoted in the County that is compatible with and diversifies the economic base;*
- *Sustainable development that is compatible with the natural environment;*
- *The expansion of infrastructure including natural gas, power, and widened roads;*
- *An increase in new industry;*
- *Attract jobs with higher wages, more benefits;*
- *Downtowns with an anchor business;*
- *Themed industry clusters in the downtowns;*
- *Eco-tourism;*
- *Unique destinations that draw visitors to the communities;*
- *Year-round economic development; and*
- *An economy that draws from a broad-based market area and type.*

The County Planning Document also states open space and natural resource conservation goals including:

- *Preserve areas that shape our rural character;*
- *Preserve farmlands and productive forestland;*
- *Provide sites for recreation;*
- *Protect surface water; lakes, rivers, streams, wetlands;*
- *Protect steep slopes and scenic viewsheds;*
- *Encourage municipalities to evaluate their zoning to allow for a diversity of development fitting with local character;*
- *Encourage meaningful open space preservation within private development through various techniques such as Planned Unit Developments, Clustering, and other creative design methods;*
- *Encourage the adoption of sustainable land management practices.*

The EPT Concord Resort will attract residents and visitors to the area, which will translate into economic benefit not only from dollars spent, property, hotel, gaming and sales tax revenue but also by creating jobs. The Proposed Project will also incorporate sustainable development initiatives, set aside approximately 45 percent of the Project Site as open space, and provide significant additional indoor and outdoor recreational amenities to both residents of, and visitors

to, the EPT Concord Resort as well as those currently residing in the surrounding communities. Additional detail on the anticipated local and regional economic benefit of the Proposed Project can be found in Chapter 14, “Economic Conditions.”

### **C. PROJECT SITE HISTORY**

It was in 1935 that Arthur Winarick took possession of what was the “Ideal Plaza in Kiamesha Lake” in settlement of a debt. From then on the Concord Resort was a key vacation spot in the Catskills. The Concord Resort was a jewel in a chain of Borscht Belt resorts during the 1950’s, 60’s and 70’s, with 1,500 rooms, a dining room that seated 3,000, and three golf courses; it was the largest resort in the region. With a reputation for sumptuous kosher dining and entertainment that included some of the most famous comedians and singers of the day, the Concord Resort became a world-famous destination for visitors to the Catskills. Dominating the Concord Resort was the “Monster” Golf Course and its storied past. The Monster Golf Course has been rated by *Golf Digest* as one of “America’s 100 Greatest Golf Courses.” But a changing world, market and economy found the Resort filing for bankruptcy in 1997, and in 1998, it was closed.

In 1999 the Concord Resort was included in a 1,735± acre development project sponsored by Concord Associates, LP and/or its affiliates (“CALP”). As part of the CALP plan, a Planned Resort District (PRD) zoning law was created in the Town of Thompson, with the requirement that a Comprehensive Development Plan (CDP) be approved by the Town Board. CALP’s CDP for the site was approved by the Town Board in 2006, with several amendments following.<sup>1</sup> The CALP CDP proposed a casino resort that included the redevelopment of the original Concord Hotel, a convention center, harness horse racetrack, lodge and spa, 3,000 residences, theaters, the Monster Golf Course with a new clubhouse and spa, and various retail uses.

The CALP PRD, the associated CDP and site specific plans for an initial phase of development were the subject of a review under SEQRA conducted by the Town of Thompson Town Board acting as Lead Agency. The DGEIS for the project was deemed complete on August 1, 2006. Following the close of the required public hearing on this document, a Final Generic Environmental Impact Statement (FGEIS) was generated in response to comments received on the DGEIS. The FGEIS was deemed complete by the Lead Agency on October 25, 2006. The Findings Statement generated for the CALP project was adopted by the Town Board on November 21, 2006, thereby concluding the SEQRA review. The Lead Agency found that the project with proposed mitigation would not result in significant adverse impacts.

The original Concord Hotel was demolished in 2008. However, CALP has, to date, been unable to successfully bring the project to completion, and in 2008 construction of the first phase of the CALP plan was halted.

CALP also demolished the original clubhouse at the Monster Golf Course. The Monster Golf Course, which the Applicant now owns, continues to operate and to be played by visitors from around the world. With the development of the Proposed Project, the existing maintenance building and recently erected temporary modular clubhouse that currently serve the Monster Golf Course will be replaced, to return this course to its past splendor.

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<sup>1</sup> First Amendment to the CDP Approval Date: January 16, 2007; Second Amendment to the CDP Submission Date: March 12, 2008.

Adjacent to the Monster Golf Course is the International Golf Course, which was recently discontinued for use as a golf course but its fairways and greens, although overgrown, remain. In addition, there is the Chalet Golf Clubhouse, a former ski area/runs, spring and pump house, and several cottages, barns, houses and bungalow colonies within the Project Site. Most are situated along the roadways that traverse the property. Some have been abandoned or recently demolished. It is anticipated that the remainder of the structures on the Project Site will be demolished, but details regarding the specific disposition of the existing structures would be detailed during the Site Plan approval process for each future phase of development.

In 2010, approximately 1,538 acres of the original site were transferred to EPT by Concord Resorts, LLC. As such, the EPT Project Site, together with other properties acquired by EPT, represents approximately 90 percent of the area within the PRD district and is the subject of this DGEIS/DEIS. The land use plan and approvals for the remaining 160± acres that CALP owns or has certain lease option rights to will be unaffected by the Proposed Project.

#### **OTHER PROJECTS IN THE STUDY AREA**

Table 2-1 in Chapter 2, “Land Use and Community Character, Zoning and Public Policy” of this DGEIS presents projects located within or in close proximity to the study area that were identified by the Lead Agency and local officials associated with nearby municipalities as potential No Build projects. Additional detail on the location of these potential No Build projects, including a key location map, can be found in Chapter 2.

### **D. PROJECT SITE DESCRIPTION AND SETTING**

#### **SITE LOCATION, ACCESS, AND CIRCULATION**

The Project Site is located in central Sullivan County, New York, within the Town of Thompson. Towns and Villages surrounding Thompson include: Liberty, Fallsburg, Mamakating, Forestburgh, Lumberland and Bethel. The Project Site lies to the south and east of Kiamesha Lake in the northeast portion of the Town of Thompson. The Site is bordered on the south by New York State Route 17 (NYS Route 17), on the west by New York State Route 42 (NYS Route 42), on the north by County Route 109 (CR 109 - Kiamesha Lake Road), and on the east by County Route 161 (CR-161 Heiden Road). **Figure 1-1** presents the Proposed Project Location.

The Project Site is supported by a series of Interstate Highways, including I-80, I-84, I-684, I-87 and I-95. Primary highway access to the Project Site is proposed from NYS Route 17 via exit 106, which connects to Joyland Road and provides access to the Project Site from the south. NYS Route 17 is a four-lane divided highway that runs east-west with a posted speed limit of 65 mph. To the east of the Project Site, NYS Route 17 connects with the New York State Thruway (I-87) and to the east with Interstate 81. **Figure 1-2** presents the Surrounding Road System. **Table 1-1** presents roads serving the Project Site.

Alternate access to the Project Site is from NYS Route 17 via exits 105B and 107. From Exit 105B, access to the Project Site is via Concord Road heading northbound. Exit 107 provides access onto Sullivan County Route 161 (Heiden Road) where access to the Project Site is gained via Thompsonville Road or CR 109 to Chalet Road.

**Table 1-1**  
**Roads Serving the Project Site**

Road Name	Alternative Name	Jurisdiction
Kiamesha Lake Road	CR 109	Sullivan County
Concord Road	na	Town of Thompson
Rock Ridge Drive	na	Town of Thompson
Thompsonville Road	na	Town of Thompson
Joyland Road/Chalet Road	na	Town of Thompson
Heiden Road	CR 161	Sullivan County

Kiamesha Lake Road (CR 109) is a two-way, east-west roadway which connects with NY Route 42 to the west of the Project Site and with Heiden Road (CR 161) to the north. Kiamesha Lake Road is approximately 25 feet wide, accommodating one traffic lane in each direction with a posted speed limit of 30 mph. Concord Road is two-way east-west roadway extending from NYS Route 42 to Kiamesha Lake Road (CR 109). Concord Road is approximately 30 feet wide and accommodates one traffic lane in each direction with a posted speed limit of 30 mph.

Rock Ridge Drive enters the Project Site from the south and intersects with Concord Road on the north. Rock Ridge Drive is a two-way north-south roadway, approximately 20 feet wide, and contains one traffic lane in each direction. There is no posted speed limit.

Thompsonville Road originates from Rock Ridge Drive and runs northeast across the southern portion of the Project Site to Heiden Road (CR 161). Joyland Road enters the Project Site from Exit 106 off NYS Route 17 and runs north through the Project Site to its intersection with Thompsonville Road. On the north side of Thompsonville Road, Joyland Road becomes Chalet Road.

**PROJECT SITE DEFINITION**

The Project Site is comprised of approximately 1,538 acres in mostly contiguous parcels located at the crossroads of Joyland Road and Thompsonville Road, generally bound by Kiamesha Lake Road, NYS Route 17, Concord Road and CR 161. The Project Site’s topography is characterized by the lowland valley of Kiamesha Creek that generally flows from south to north through the center of the Project Site and its higher elevation uplands to the east and west. Elevations range from a low point of 1,340 feet above sea level near the center of the site to a high point of 1,660 feet above sea level on the western side. The highest point on the Project Site’s eastern side is 1,550 feet above sea level. **Figures 1-3a to 1-3c** present an overview of the existing site features.

The Project Site is divided into four primary development areas as shown in **Figure 1-4**, Primary Development Sites. Within each primary development area, the Proposed Project components will be phased over an approximately 10-year horizon<sup>1</sup> beginning with Phase 1, from which all additional components will flow. After the receipt of site plan approval for Phase 1, the Applicant will finalize design review details for the golf course program and select components of the entertainment village at the Resort Core. In addition, based on the Project Site analysis, the Proposed Project seeks to incorporate green corridors connecting the development areas (see

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<sup>1</sup> Timing for full project build out is assumed to be 10 years for analysis purposes, but actual build-out will be determined by market and economic conditions and timing for permits and approvals.



SOURCE: Hart Howerton

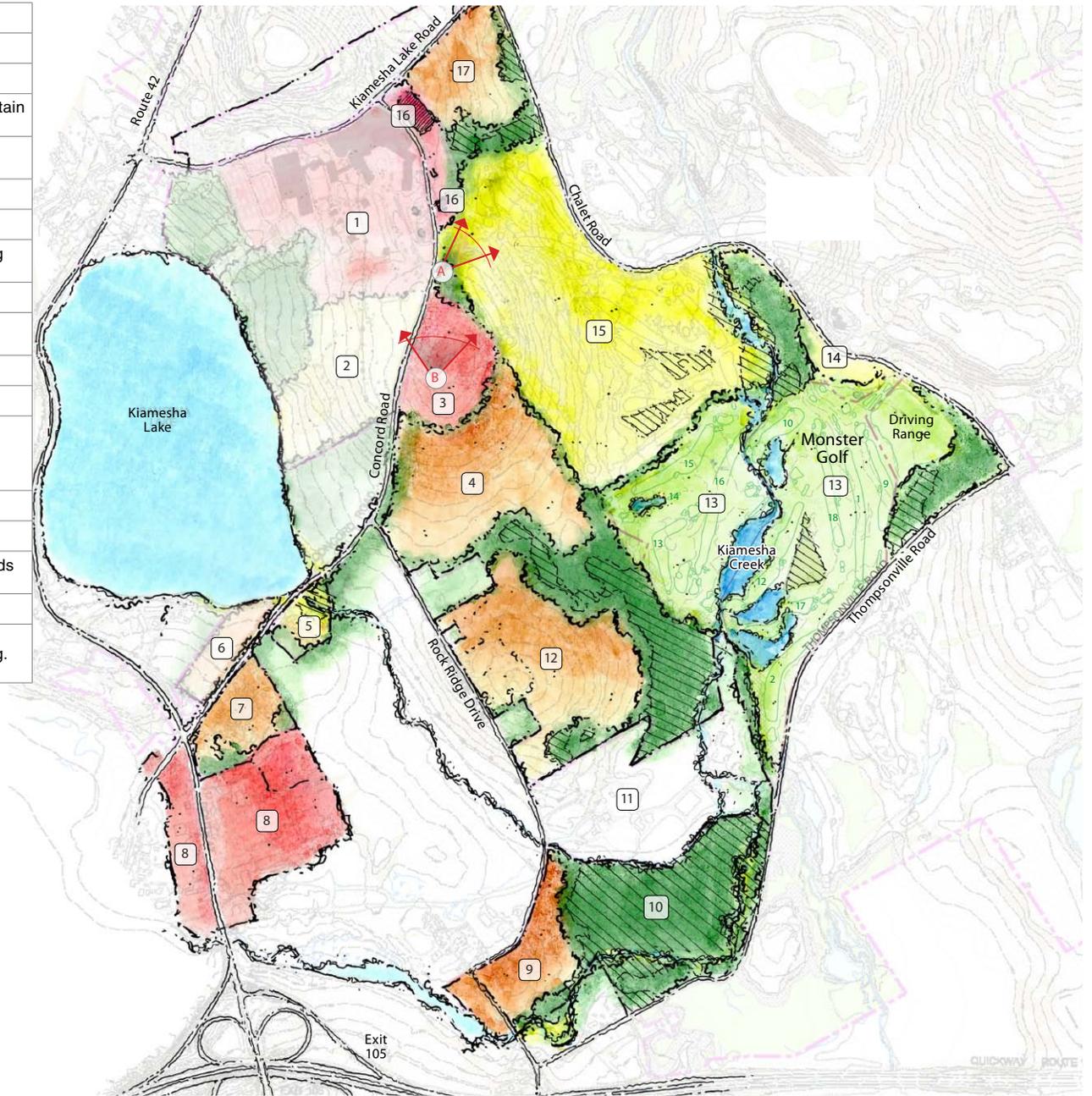




SOURCE: Hart Howerton



VIEWSHED ANALYSIS LEGEND	
1	Demolished Concord Hotel; construction debris; negative impact
2	Open Meadow; old Par 3 course
3	Graded / Disturbed Area; highest spot on site; good distant mountain views to North & East
4	Potential Development - hardwood / evergreen forest; South exposure; avg. 10% grade
5	Cleared Cottage Complex; open field
6	Wooded Lakeside Parcel; lakefront views & access
7	Abandoned Cottage Complex; open meadow; adjacent to existing commercial center
8	Existing Strip Retail along Route 42
9	Potential Development - hardwood forest; hilltop; max 10% grade
10	Wooded Wetlands
11	Thompsonville Sewage Treatment Plant
12	Potential Hillside Development - possible golf views to East; mix of hardwood / evergreen forest; open field at high point with abandoned buildings; East exposure; avg. 10% grade
13	"Monster" Golf Course; needs some renovations
14	"Monster" Golf Course Parking; good views of the course
15	Abandoned "International" Golf Course; open meadows and stands of mature trees; meadows provide sunlight and views
16	Contaminated Soil Storage; brownfield sites
17	Potential Development - hardwood forest; possible golf views to South; East exposure; avg. 15% grade



SOURCE: Hart Howerton

Existing Site Features  
Figure 1-3a



VIEWSHED ANALYSIS LEGEND	
1	Abandoned Horse Farm - existing barn; open meadows & hardwood forest; some views of Kiamesha Creek; South exposure; +/- 10ac meadow is gently sloping up to 20%+ in woods
2	Abandoned "International" Golf Course bisected by Kiamesha Creek; attractive naturalized meadows & stands of mature trees could be used as guide for development of wooded sites to provide views and sunlight; open space / view corridors
3	Abandoned Ski Area / Runs
4	Existing Chalet Golf Clubhouse
5	Prime Development Site - wooded hilltop parcel with possible distant mountain views to East and golf views to West; mixed hardwood / evergreen forest
6	Outparcel Residence
7	Potential Development Site - +/- 10ac parcel; cleared cottage complex; open meadow enclosed by woods; some construction debris
8	Existing Spring & Pump House
9	Disturbed Area
10	Development Site - hillside parcel; good views to Northeast from ridgeline; predominantly hardwood forest; 5 - 15% grade
11	Prime Development Site - wooded hillside parcel with possible distant mountain views to North and East; mixed hardwood / evergreen forest; 0 - 10% grade; good views to existing "International" golf course



SOURCE: Hart Howerton

Existing Site Features  
Figure 1-3b



VIEWSHED ANALYSIS LEGEND	
1	Vacant Cottage Complex
2	Prime Development Site - hilltop parcel; limited golf and Lake #1 views; some open areas & existing structures; 0 - 10% slopes
3	Development Parcel - hillside parcel; good golf views with clearing; 10% grade; West exposure
4	Monster Golf
5	Development Parcel - wooded parcel; some clearing; good views of Golf Hole #3 and stream
6	Wooded Wetlands
7	Cemetery
8	Stream; visual amenity
9	Prime Development Site - ridgetop parcel; mature evergreen forest; good views of Lake #2 and limited golf views; 0 - 10% grade; North and East exposure
10	Occupied Homes & Cottage Complex along Joyland Road
11	Outparcel Residence
12	Lake #2 - shallow; swampy; visible stumps
13	Potential Development Parcel - wooded hillside; good views of Lake #2; West exposure; 10% max grade
14	Potential Development Parcel - open meadow with good views and access to Lake #1; 0 - 5% grade
15	Lake #1 - very picturesque; drains over land into Lake #2
16	Prime Development Site - hill/ridgetop parcel; good views and access to Lake #1; mix of evergreen & hardwood forest with some cleared areas 0 - 10% slopes; possible distant mountain views to North and East
17	Outparcel Existing Cottages
18	Vacant Cottage Complex - potential development site
19	Development Parcel - corner parcel; access to Thompsonville & Joyland Road; mix of hardwood & evergreen forest; 0 - 5% grade



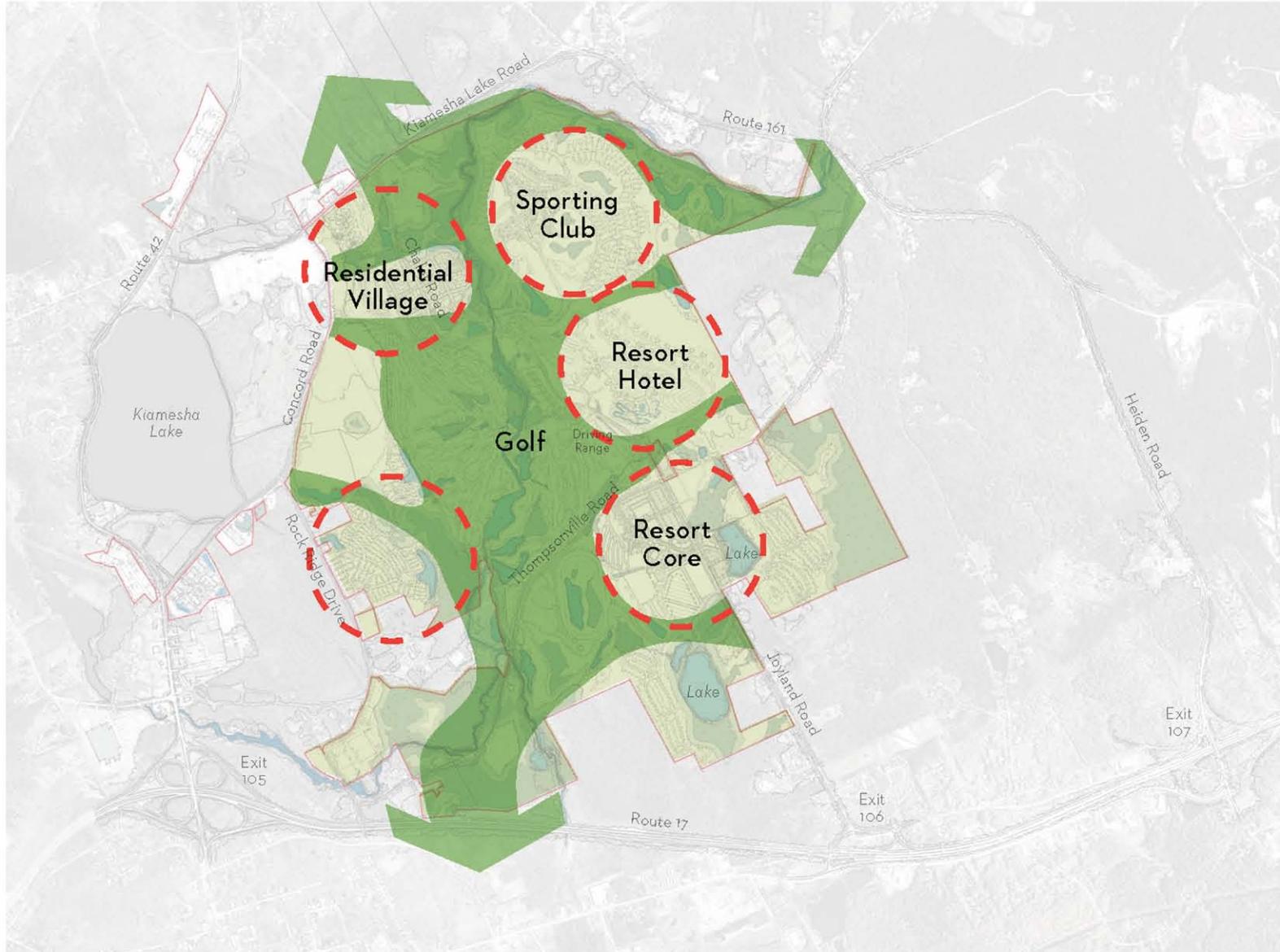
SOURCE: Hart Howerton





SOURCE: Hart Howerton





SOURCE: Hart Howerton



Figure 1-5). The green corridors will include community lakes, parks, trails, open spaces and recreation areas.

Table 1-2, Tax Parcels in the PRD, CDP and Phase 1, presents the tax parcels that comprise the existing PRD district, the subset of parcels that comprise the Project Site and the parcels that comprise Phase 1 of the Proposed Project.

**Table 1-2  
Tax Parcels in the PRD, CDP and Phase 1**

Section	Blk.	Lot	PRD	CDP <sup>(3)</sup>	Phase 1 <sup>(1)</sup>
9	1	18.1		*	
9	1	34.1			
9	1	34.2			
9	1	34.4			
9	1	34.5			
9	1	34.6			
9	1	34.7			
9	1	35.0			
10	15	8			
10	15	5.2			
10	13	6			
15	1	4		*	
15	1	5		*	
15	1	11.1			
15	1	11.2			
15	1	12.1		*	
15	1	12.3			
15	1	13			
15	1	14.1			
15	1	14.2			
15	1	14.3			
15	1	15			
15	1	16			
15	1	17			
15	1	18			
15	1	19			
15	1	22			
15	1	24			
15	1	25			
15	1	35.7			
15	1	49		*	
15	1	50			
15	1	51			
23	1	11.3			
23	2	1			
23	2	2			
23	2	3			
23	2	4			
23	2	6			
23	2	8			
23	2	10			
23	1	48			
23	1	52			
23	1	53			
23	1	54.1			
23	1	54.2			
23	1	54.3			

**Table 1-2 (cont'd)**  
**Tax Parcels in the PRD, CDP and Phase 1**

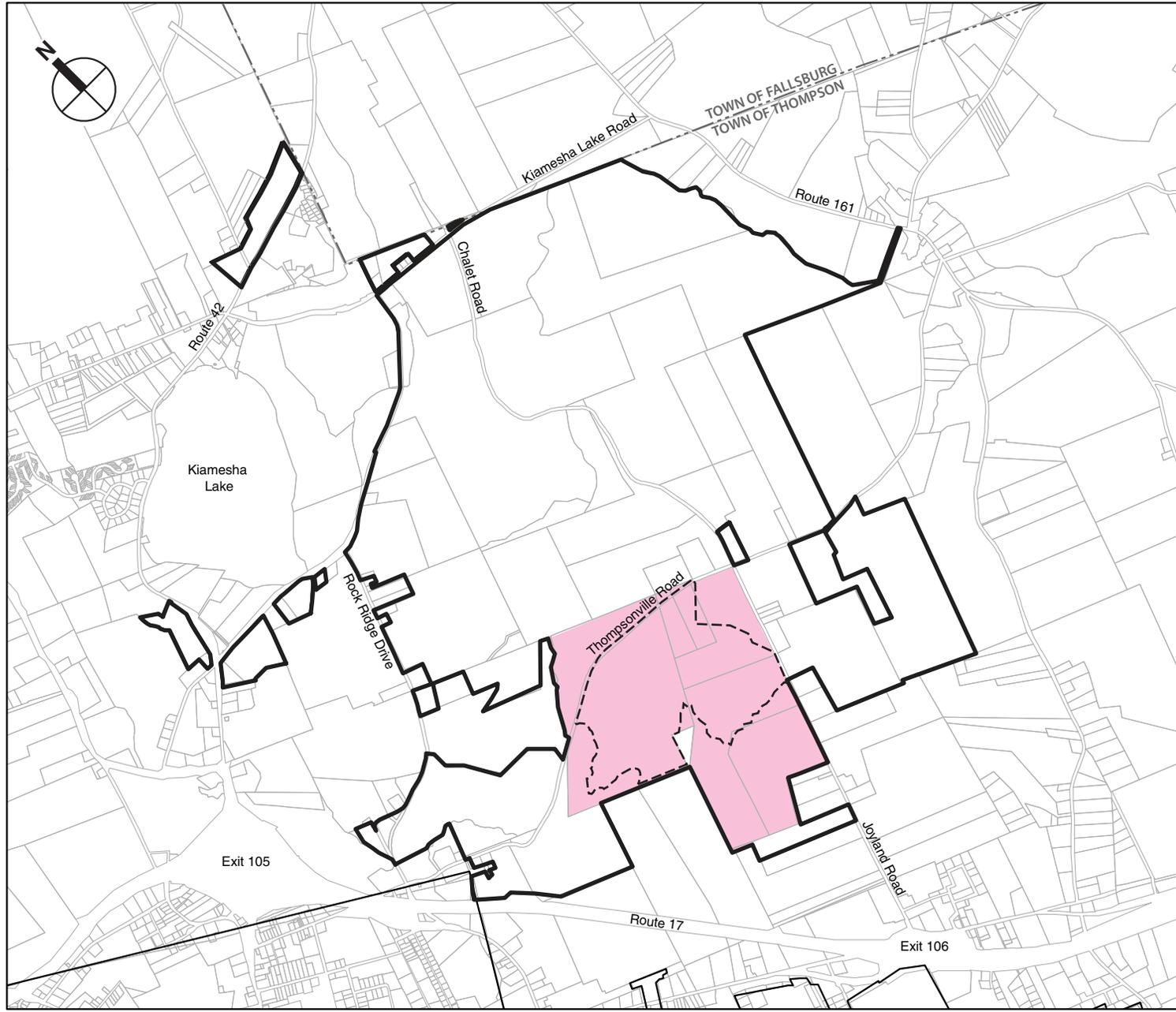
Section	Blk.	Lot	PRD	CDP <sup>(3)</sup>	Phase 1 <sup>(1)</sup>
23	1	54.4			
23	1	55			
23	1	61.2			
13	1	28		*	
13	1	53		*	
13	3	2.1		*	
13	3	2.2		*	
13	3	5		*	
13	3	7		*	
13	3	12			
13	3	17			
13	3	18			
13	3	19.1			
13	3	19.3			
13	3	20.1			
13	3	20.2			
13	3	20.3			
13	3	22			
13	3	25.1			
13	3	25.2			
13	3	25.3			
13	3	26.1			
13	3	26.2			
13	3	45		*	

**Notes:**  
 (1) Tax Parcels noted for the Phase 1 Site may be all or part of the tax parcel.  
 (2) Parcels do not include those outside of the PRD, such as those that will be required for widening of Joyland Road.  
 (3) Parcels included in the CDP are owned or controlled by the Applicant. Parcels not included in the CDP, but that are within the PRD, are assumed to be owned or controlled by CALP or others.  
 Parcels marked with an asterisk (\*) are non-contiguous parcels.  
**Source:** Entertainment Properties Trust

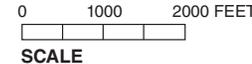
**PHASE 1 SITE**

The proposed Phase 1 Site (“Phase 1”) is approximately 125 acres and is located in the southern portion of the Project Site. It is bordered by Thompsonville Road on the north and Joyland Road on the east. Monticello Raceway Management, Inc. (“MRMI”) has an option to lease the property from the Applicant. Thus, MRMI proposes to be the developer of the Casino Resort at the Resort Core with a Casino Hotel, and harness horse racetrack, grandstand/showroom, simulcast facility, banquet event center and restaurants and related facilities. Phase 1 includes all or part of the following tax parcels: 23-1-53, 23-1-54, 23-1-54.1, 23-1-54.2, 23.-1-54.3 and 23-1-55. (See **Figure 1-6** for an illustration of the tax parcels included in whole or part in the Phase 1 Site.) At present, there are no structures or built features on the proposed Phase 1 Site. The parcels are generally characterized by manicured lawns from the Monster Golf Course, with trees and wooded borders in the western portion and forested upland and wetlands in the east.

The Phase 1 development program will require infrastructure improvements to water supply, stormwater, sanitary services and site access. Although these improvements will specifically support the Phase 1 development program, they will also be designed to support future development phases of the Proposed Project. For the purpose of this DGEIS/DEIS, these



- Project Site Boundary
- - - Phase 1 Boundary
- Tax Parcels Included in Phase 1 Site



Tax Parcels Included in Phase 1 Site  
**Figure 1-6**



Infrastructure Improvement Areas are addressed under the Phase 1 heading throughout this document.

## **E. COMPONENTS OF EPT CONCORD RESORT PROJECT**

### **PROPOSED AMENDMENTS TO THE PRD ZONING REGULATIONS (PROPOSED ACTION)**

To develop the EPT Concord Resort, the Applicant has petitioned the Town Board of the Town of Thompson for an amendment to the Town of Thompson Planned Resort Development (“PRD”) section of the zoning law (Town Code §270-27.2).

When the PRD zoning law was originally adopted in 2006, the entire 1,735± acre property within the PRD zoning district was owned or controlled by CALP. In November 2006, the Town Board approved a Comprehensive Development Plan (“CDP”), a requirement of the PRD, for the 1,735± acres owned or controlled by CALP. The CDP was later amended by CALP in 2008 to include a casino, harness horse racetrack, grandstand and related buildings. However, in June 2010, CALP, without completing any phases of construction, deeded ownership and control over the majority of the land within the PRD zoning district and CDP to the Applicant. In 2011, the Applicant acquired additional property within the PRD zoning district, known as the Monster Golf Course and the International Golf Course. With these actions, the Applicant became the owner of approximately 90 percent of the land within the PRD zoning district.

The proposed PRD zoning text amendments will allow the development of a CDP by any property owner that meets the minimum PRD site requirements or has received prior approvals and associated development rights before this Proposed Action. The proposed PRD zoning amendments do not affect previous approvals or development rights received by CALP for the 160± acres it owns or has certain lease options to, nor will those rights be affected by the Applicant’s development plans. Additional detail on the proposed changes can be found in the full text of the proposed zoning amendment in Appendix A-2 of this DGEIS.

The intent of the PRD district has not changed. The PRD district requires that the Town Board approve an overall site CDP for a minimum 1,200-acre site, and allows flexibility in designing that site from typical zoning regulation constraints. The PRD district must contain at least one 18-hole golf course, must devote at least 35 percent of the gross site area for open space and have a maximum residential density for the approved CDP of 4.0 units per acre of net site area. In addition, each phase of the proposed development would still require site plan approval from the Planning Board.

The proposed revisions to the PRD zoning text will allow additional non-residential density for hotel/motel units, codifies certain uses already permitted in the PRD, and allows additional permitted uses within the PRD, including a racino, equestrian facilities including harness horse racing, farm markets, amusement parks and community gardens, medical services, brewery and an artisanal distillery.

### **MASTER PLANNED DESTINATION RESORT (PROPOSED PROJECT)**

#### *OVERALL RESORT CONCEPT PLAN*

EPT envisions the development of a high-quality master planned destination resort community on the former Concord Resort property. Innovatively arranged for visual access to the rural

## **EPT Concord Resort**

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Catskills setting, the EPT Concord Resort will capitalize on the historic legacy and beauty of the Catskills. Proposed to be developed over ten years, the EPT Concord Resort will have a variety of spaces, products, destinations, amenities and experiences. Due to its rural setting, the presence of the historic Monster Golf Course, and the inclusion of a Casino Resort, the Applicant will create a four-season tourism and gaming resort destination.

The site planning for the EPT Concord Resort is the result of careful study of the unique nature of the region, Project Site, and analysis of the market potential within the Catskills. It is the goal of the Applicant for the EPT Concord Resort to be the center of activity and investment in the region and be a:

- Great place to go again and again...a place that will generate year-round, repeat visits, and a high volume destination with the right critical mass of activity;
- Great place to stay, in a range of settings and price points;
- Great place of energy, fun, work, and play, increasing demand through the synergy created by combining program elements; and
- Great place for sustained investment with prime, ready-made sites linked by efficient and sustainable infrastructure.

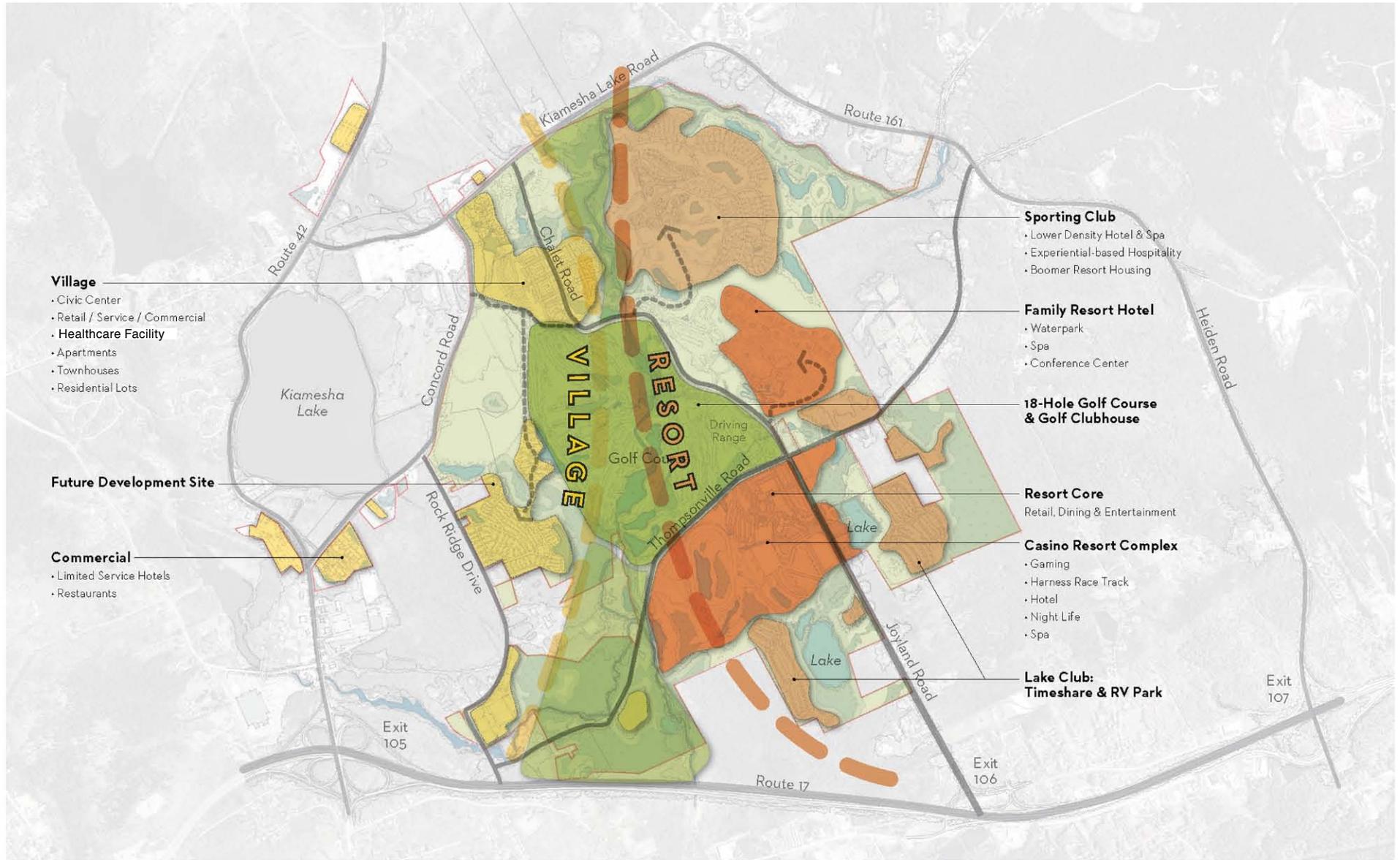
The destination resort being proposed by the Applicant will preserve the natural features and landscape that has been drawing people to this region for decades. The proposed EPT Concord Resort will offer: short- and long-term lodging opportunities; a variety of residential choices including apartments, townhouses and single-family homes; indoor and outdoor recreation opportunities; gaming, equestrian activities, and small- and larger-scale commercial/retail options and restaurants.

The Project Site is divided into two sectors as illustrated in **Figure 1-7**. The eastern portion of the Project Site will be devoted to resort uses, including the Sporting Club, Family Resort Hotel, Monster Golf Course, Casino Resort Complex, Entertainment Village, and Lake Club with time-shares and Recreational Vehicle Park. The western portion of the Project Site includes the Village uses, such as the civic center, retail/service and commercial uses, innovative health care facility and uses, and apartments, townhomes and single-family residential lots. Some commercial development including smaller hotel uses and restaurants will also be located on the non-contiguous outparcels located on the western edges of the Project Site.

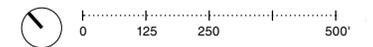
The EPT Concord Resort will cluster development where the natural topography of the land is most suitable. Clustering will create centers of activity, minimizing infrastructure needs and protecting natural resources and large areas of open space. **Figure 1-8** presents the overall Illustrative Master Plan for the Project Site, and **Table 1-3** presents acreage and Net Usable Land Area (NULA) for the various project components.

### *COMPREHENSIVE DEVELOPMENT PLAN (CDP)*

As required in the PRD, the Applicant proposes to develop the Project Site in conjunction with Comprehensive Development Plan (CDP), included as Appendix A-2 and illustrated in Figure 1-7. The CDP presents the conceptual development plan for the Project Site as divided into five key neighborhood areas: (1) the Resort Core, (2) Golf, (3) Residential Village, (4) Resort Hotel and (5) Sporting Club. The general land use plan for the Project Site is presented in **Figure 1-9**. **Table 1-4** presents the overall unit count for residential and commercial uses for the EPT Concord Resort. Details on the bulk and density requirements can be found in Table 2-2 in Chapter 2, "Land Use and Community Character, Zoning, and Public Policy."



SOURCE: Hart Howerton







SOURCE: Hart Howerton





LAND USE	
	Residential
	Hospitality
	Harness Track (within Casino Resort)
	Casino Resort (Contains Hospitality Uses)
	Commercial
	Golf
	Hotel/ Casino / Harness Track / Convention Center / Retail (previously approved)



SOURCE: Hart Howerton



**Table 1-3  
Project Components and Acreage**

	Estimated Total Acreage
Entertainment Village	282
Family Resort Hotel	101
Sporting Club	267
Residential Village	127
Future Development Parcel	204
Golf	236
Recreation Core	33
Southwest Commercial Parcel	75
Commercial Parcels (non-contiguous)	59
<b>Total</b>	<b>1,384</b>

**Note:** Estimated acreages have been rounded.  
**Source:** Hart Howerton

**Table 1-4  
Land Use Program Summary<sup>1</sup>**

Program	Units/Rooms/SF
Residential	897 dwelling units
Hospitality (Hotel, Resort and Conference Center)*	1,800 keys
Spa	7,500 sf
Indoor Waterpark**	45,000 sf
Conference Center**	50,000 sf
Casino Resort Hotel Amenities	15,000 sf
Casino***	405,000 sf
Commercial (Retail)^	475,000 sf
Commercial (Other)	
Golf Clubhouse^^	20,000 sf
Golf School	4,000 sf
Golf Maintenance Building^^	9,000 sf
Support/Back of House (BOH)	30,000 sf
RV Park	60,000 sf
Innovative Healthcare Facility^^^	90,000 sf
Recreational Sports Center	40,000 sf
Movie Studio	175,000 sf
<b>TOTAL COMMERCIAL</b>	<b>903,000 sf</b>
Civic Center^^	35,000 sf

**Notes:** Estimated square footages have been rounded.  
\* Some hospitality uses occur within the Casino Resort area.  
\*\* Indoor Waterpark and Conference Center are ancillary uses to the Hotel Program (at full build out)  
\*\*\* The Casino Resort also includes the harness horse racetrack.  
^ Commercial Parcel #2 (Kiamesha Lake Parcel 1) may include two 125 room hotels and 19,200 sf of restaurant or 65,000 sf of commercial use  
^^ Golf uses exist on the Project Site.  
^^^ These uses are planned to be located within the Residential Village  
**Source:** Hart Howerton

<sup>1</sup> It should be noted that the proposed CDP is illustrative and represents land use options that could be developed on the Project Site. However, because the Proposed Project will be market driven, the staging and combination of uses that will ultimately be developed on the Project Site is yet to be determined. Nonetheless, for the purpose of this DGEIS/DEIS, a single reasonable and conservative combination of uses has been used for analysis.

**Table 1-5** presents the total open space proposed on the Project Site. Consistent with the Town of Thompson Code, which requires 35 percent of gross site area in a PRD district to be dedicated to open space, the proposed EPT Concord Report proposes approximately 696 acres, roughly 45 percent of gross site area, to be set aside as open space.

**Table 1-5  
Open Space**

Open Space	Estimated Total Acreage
Golf (including wetlands, waterbodies and setbacks)	220
Recreation Core (including wetlands, waterbodies and setbacks)	33
Additional Wetlands and Waterbodies	281
Additional Setbacks	125
Parks (5 percent of NULA)	37
<b>Total</b>	<b>696</b>
<p><b>Notes:</b> Per requirements of the Town of Thompson Code, gross acreage is assumed to be 1,538 acres. Gross acreage to be verified upon completion of final property boundary survey. Estimated acreages have been rounded.</p> <p><b>Source:</b> Hart Howerton</p>	

*Resort Core*

The Resort Core is proposed to be located in the southeast portion of the Project Site on the east and west sides of Joyland Road, south of Thompsonville Road. The Resort Core includes the Casino Resort and the Entertainment Village and will be the activity center of the EPT Concord Resort, establishing Sullivan County as a regional entertainment destination. As illustrated in **Figure 1-10**, the Resort Core would contain the entertainment zone, ice rink, Casino Resort, market square, conference center and lakefront park, and the tent and event field. Figure 1-9 also presents the proposed pedestrian circulation plan for this development area.

The Resort Core represents the central activity center of the EPT Concord Resort and will be the most “public” areas with opportunities for signature building designs, pavilions and open air structures, gathering spaces and a traditional square. The built environment will be designed to maximize views and be respectful of the existing natural landscape and topography. **Figure 1-11** presents the proposed uses in the Resort Core. On the west side of Joyland Road, the uses within the Resort Core include:

- The Entertainment Village
- Ice Rink
- Nature Trail
- Casino Resort and Parking (for guests and employees)
- Gateway Park

On the east side of Joyland Road, the uses within the Resort Core include:

- Hotel and Conference Center and Parking
- Lakefront Park
- Tent Event and Field

With the exception of the hotel tower at the Casino Resort located on the west side of Joyland Road, buildings within the Resort Core are proposed to be one- and two-story structures. The

LEGEND	
1	Entertainment Zone
2	Ice Rink
3	The Casino Resort
4	The Market Square
5	Conference Hotel & Lakefront Park
6	The Tent
	Pedestrian Circulation



SOURCE: Hart Howerton



LEGEND	
1	Entertainment District • 115,000 sf Entertainment Retail • 40,000 sf Theater
2	Ice Rink
3	Nature Trail
4	Casino Hotel: Phase 1
5	Casino Hotel: Phase 2
6	Entry Feature
7	Casino Resort: Phase 1
8	Casino Employee Parking
9	Casino Parking
10	Conference Hotel Parking
11	Gateway Park
12	Lakefront Park
13	Hotel & Conference Center
14	"Tent" Event Field
15	Entertainment District Parking
16	Stormwater Retention



SOURCE: Hart Howerton

Resort Core Illustrative Plan  
Figure 1-11



Casino Hotel is proposed to be nine stories, and is described in more detail below. Architectural features and roof forms will be varied and designed to balance massing while creating a diverse streetscape. It is anticipated that a variety of local and national retail and commercial tenants will populate this area, complementing one another and the Casino Resort.

**Figure 1-12** presents the proposed parking plan, circulation and site access within the Resort Core. The Resort Core is designed to have convenient access to parking for visitors. Initial designs provide for surface parking areas, with the exception of the garage for the Casino Resort. Future development may include additional structured parking to meet visitors' needs in case of inclement weather. Surface lots are designed to accommodate anticipated demand. Parking areas will be landscaped for aesthetics and also will include natural features to reduce stormwater volume and flow and reduce heat-island effects.

The CDP also proposes the Lake Club, timeshare and recreational vehicle park to the south of the Casino Resort. The recreational vehicle park would cater to a range of regional visitors, providing camping sites and hook-ups in a managed, maintained park setting.

#### *Golf Development Area (Golf Area)*

As shown in Figure 1-5, the Golf Area creates a wide central green space bisecting the EPT Concord Resort's public and private areas. The 7,650-yard, par 72 Monster Golf Course was built in 1963, as the original Concord Resort's third golf course on the Site (preceded by the 9-hole "Challenger" and 18-hole "International" course). As part of this Application, the Monster Golf Course will be redesigned by Rees Jones, Inc., a renowned golf course designer (see **Figure 1-13**). The Monster Golf Course will be renovated to provide opportunities for a range of golf skills. The renovation will feature the natural landscape, Kiamesha Creek, and will maximize the rolling terrain of the former International Course. In the past, the low-lying topography of the course resulted in frequent flooding, which has been exacerbated by upstream development within the Kiamesha Creek watershed. The EPT Concord Resort proposes improvements to the Monster Golf Course to reduce flooding and improve course irrigation and drainage systems to reduce weather-related course closings.

In addition to the Monster Golf Course, the Golf Area will include duplex cottages, a driving range, practice putting green and bag and cart storage areas. **Figure 1-14** presents the proposed layout of the Golf Area.

At present, the Monster Golf Course does not have a dedicated clubhouse proximate to the course, but rather utilizes the former Concord Ski Chalet as a clubhouse in conjunction with a temporary modular building on the site of the old clubhouse. The EPT Concord Resort proposes a new clubhouse with additional amenities. An on-Site Golf Academy and instructional space are also proposed within this area.

Because the weather in the northeast does not allow year-round golf play, the Monster Golf Course and clubhouse will also be used in the off-season for winter activities including cross-country skiing, sleigh rides, and snowshoeing. The clubhouse will serve as a Nordic center.

As shown in **Figure 1-15**, the Monster Golf Course site connects to a system of trails circulating throughout the EPT Concord Resort. Shuttle service would also be available for hotel patrons and EPT Concord Resort residents. A small central parking area is proposed immediately adjacent to the proposed clubhouse.

*Residential Village*

The Residential Village is proposed to be a more private side of the EPT Concord Resort, located on the west side of the Monster Golf Course. The Residential Village is located north of Chalet Road with Kiamesha Creek forming its eastern border. As shown in **Figure 1-16**, the Residential Village is comprised of single-family and multi-family residences, clustered around a central commercial core, which will be no more than a ¼ mile, or five-minute walk, from the residences. The neighborhoods are organized by a system of interconnected streets and open spaces, forming central green spaces within each sub-neighborhood. **Figure 1-17** presents the natural and green spaces, as well as general circulation patterns and the proposed trail network within the Residential Village. Stormwater retention ponds are proposed to be located to the north and south of the neighborhoods.

The general layout and proposed residential and commercial density is presented in **Figure 1-18**. Within the Residential Village are proposed 288 flats, which will include workforce housing for employees of the various uses within the EPT Concord Resort, 40 townhomes, and 37 single-family residential lots. Workforce housing will include a mix of one and two-bedroom units with an average unit size of approximately 900 sf.

The central commercial core would include local neighborhood oriented commercial, retail and service establishments. The Residential Village would also include a civic center and an innovative healthcare facility.

An innovative healthcare facility is proposed at the southern edge of the Residential Village. This facility proposes approximately 90,000 sf of medical-related facilities<sup>1</sup>, including 90 beds and 12 assisted living units. It is anticipated that the facility could include some combination of the following services:

- Clinic (5,000 sf - eight treatment rooms for medical, three dental treatment rooms, office and support space);
- Medical Office (7,500 sf);
- Physical therapy, audiology, ophthalmology and speech units (2,500 sf);
- Pharmacy and medical equipment (1,000 sf);
- Short- and long-term skilled nursing care and respite care unit (45,000 sf);
- Playground (3,000 sf); and
- Children's Respite Care & Day Care Facility (8,000 sf).

An approximately 35,000 sf civic center complex is proposed to be located west of the innovative healthcare facility within the Residential Village. The civic center is proposed to provide an opportunity for centralized services integrated into a neighborhood setting and generate a local energy within the Residential Village.

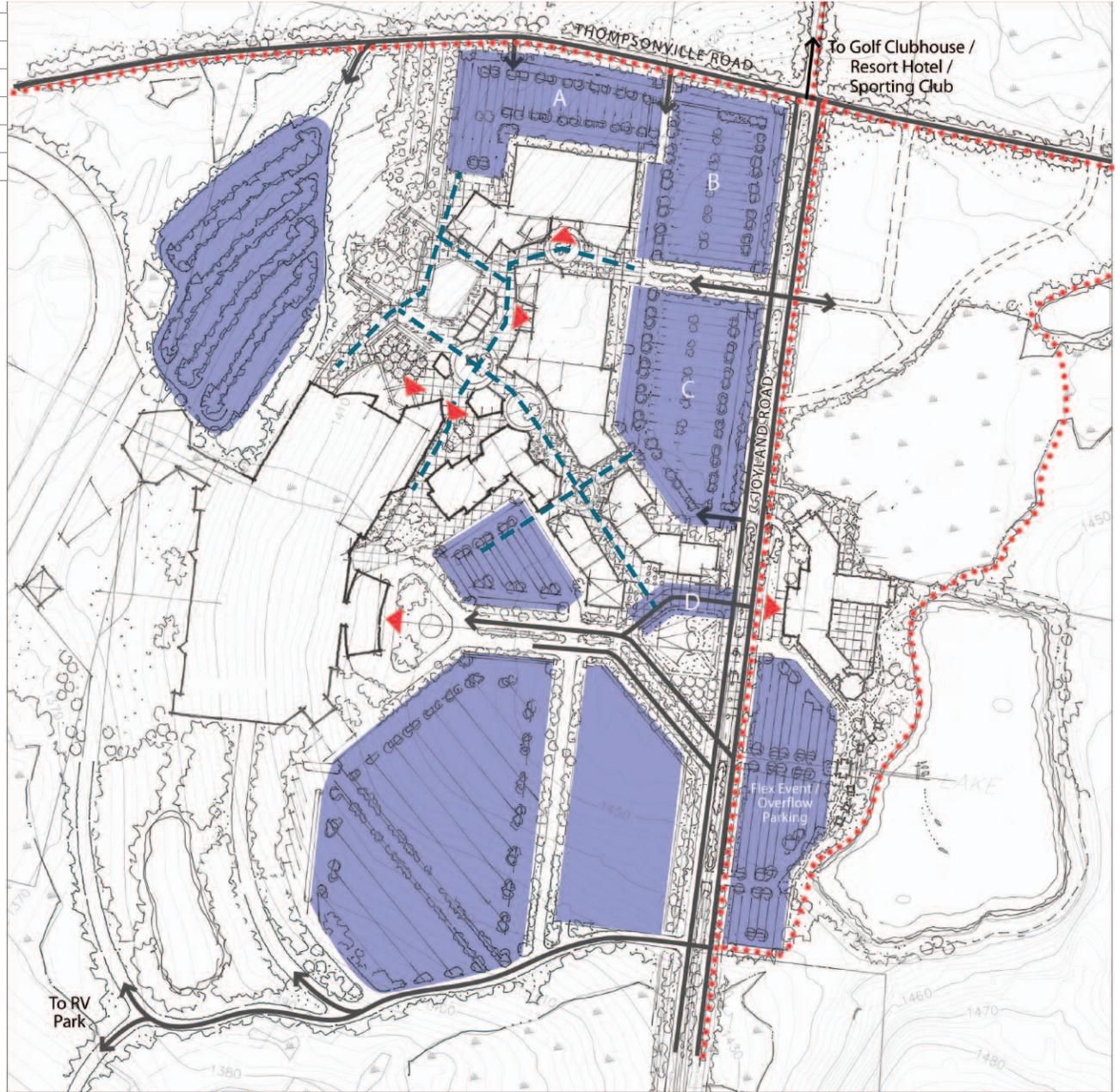
*Resort Hotel*

The approximately 100-acre Resort Hotel area is located just north of the Resort Core, on the north side of Thompsonville Road (see **Figure 1-19**). Overlooking the Kiamesha Creek Valley, the Resort Hotel site proposes a combination of guest activities, including a traditional-style

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<sup>1</sup> Accessory support uses are included in this figure such as kitchens, maintenance, and storage.

LEGEND	
	Vehicular Circulation
	Pedestrian Circulation
	Bike / Multi-purpose Paths
	Entry
	Surface Parking



SOURCE: Hart Howerton





SOURCE: Hart Howerton



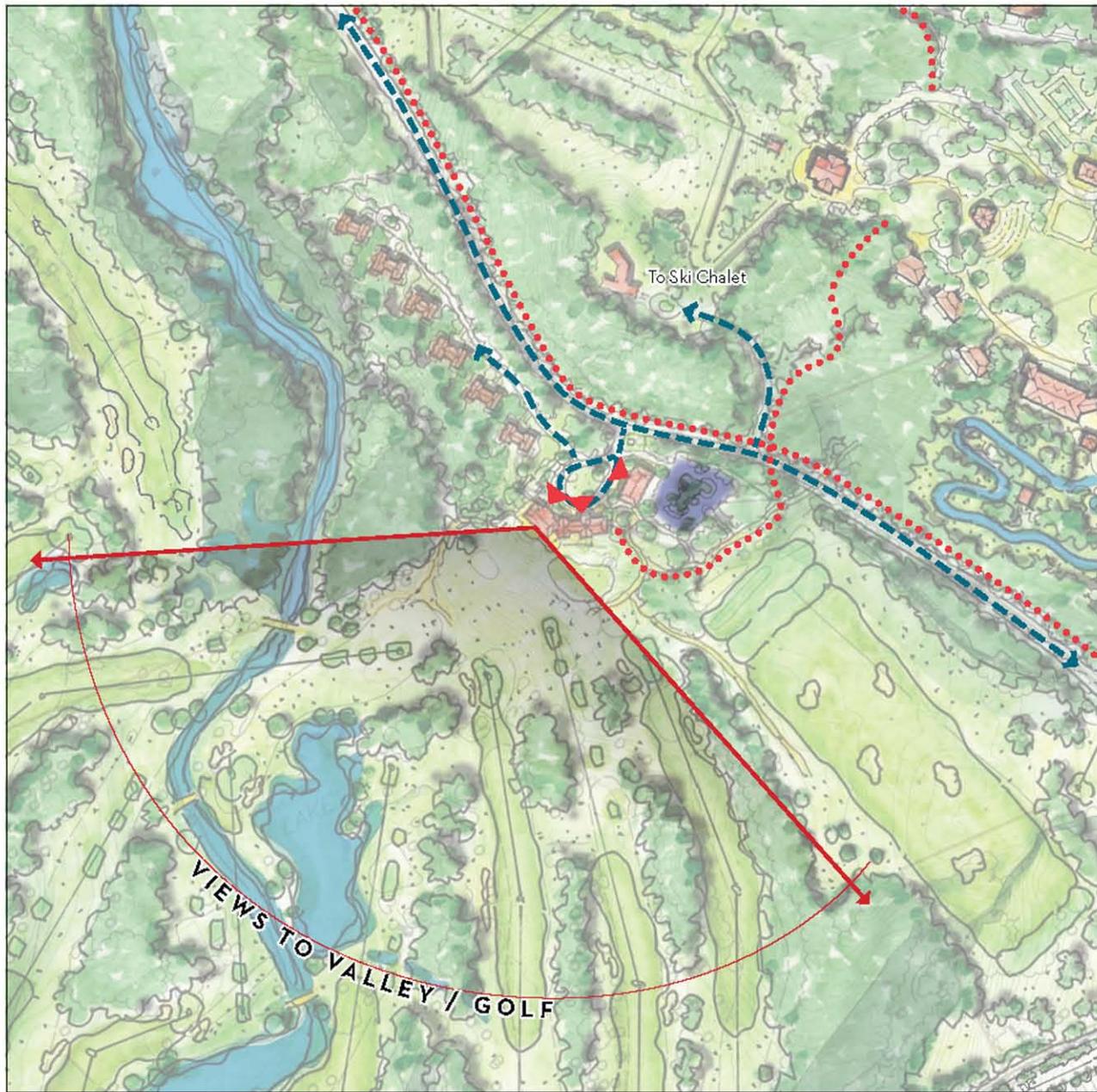


LEGEND	
1	Golf Clubhouse — pro shop; locker rooms; bar & grille
2	Clubhouse Dining
3	Duplex Cottages (12)
4	Driving Range
5	Practice Putting Green
6	Bag & Cart Storage
7	Golf Academy

SOURCE: Hart Howerton







LEGEND	
	Parking
	Circulation
	Hiking Trail
	Entry
	Architectural Feature

SOURCE: Hart Howerton

Golf Course Circulation, Parking and Viewsheds  
**Figure 1-15**



LEGEND	
1	Single Family Residential
2	Overlook
3	Multi-family Residential
4	Retail / Commercial
5	Esplanade
6	Park Pavilion
7	Creek Crossing & Nature Walk
8	Healthcare Facility
9	Neighborhood Park
10	Civic Center





LEGEND	
	Open Space
	Circulation
	Hiking Trail
	Architectural Feature



Residential Village Open Space,  
Circulation and Trail Network  
**Figure 1-17**



YIELD SUMMARY		
Use	Sq. Ft.	Units
Retail	19,200	
Civic	35,000	
Healthcare Facility		90 Beds; 12 Assisted Living Units
Flats		288
Towns		40
Lots		22
Total	54,200	362





LEGEND	
1	Chairlift
2	Hilltop Lodge — Center for skiing/boarding, tubing, mountain biking; restaurant
3	Putting Course
4	Lawn — skating rink; croquet lawn; amphitheater; event area
5	Outdoor Waterpark — pools; waterslides; spa; lazy river; pool bar
6	Indoor Waterpark (30,000 - 40,000 sf)
7	Gatehouse
8	Parking Lot — 350 - 400 spaces
9	Resort Hotel — 250 rooms; restaurants; fitness center; spa
10	Conference Center (40,000 - 50,000 sf)
11	Lawn & Raquet Sports — croquet; tennis; volleyball; basketball; shuffleboard; bocce; horsehoes
12	Hotel Cottages



SOURCE: Hart Howerton

Resort Hotel Concept Plan  
**Figure 1-19**



Catskill lodge, individual cottages, an indoor-outdoor waterpark, and connections to outdoor activities, including snow-tubing and biking on the hillside.

The Resort Hotel is proposed to contain approximately 250 rooms, restaurants, a fitness center, and a spa. Resort cottages are proposed to the east of the main Hotel area and an approximately 40-50,000 sf Conference Center is proposed immediately adjacent to the Resort Hotel. Throughout the Resort Hotel area are various active and passive recreation areas, including a putting green, and lawn and racquet sports including tennis, croquet, volleyball, basketball, shuffleboard, bocce and horseshoe courts. Other outdoor recreation activities are proposed for the lawn area and could include an ice-skating rink, amphitheater and event spaces. An indoor/outdoor waterpark (approximately 30-40,000 sf) is proposed within this district to provide opportunities for four-season aquatic activities.

**Figure 1-20** presents proposed circulation patterns, site access and viewsheds to and from the Resort Hotel area. This area will connect to a system of trails circulating throughout the EPT Concord Resort. A shuttle service would also be provided to guests throughout the EPT Concord Resort, eliminating additional vehicle trips. A central parking area is proposed on the southern end of the area, adjacent to the Resort Hotel site.

#### *Sporting Club*

The fifth development area within the EPT Concord Resort is a Sporting Club. The Sporting Club is located on the northern portion of the Project Site, north of the Resort Hotel. Situated on a hilltop and surrounded by woodlands with views north to the Catskills, the uses proposed within the Sporting Club are geared toward outdoor-oriented lifestyles with a lower density Branded Residential Community. **Figure 1-21** presents the proposed uses and layout of the Sporting Club District. The eastern border of the Sporting Club is ringed with wetlands and the Kiamesha Creek. The Lodge, Spa, Cabins and Fitness Center are clustered in the central portion of this neighborhood with single-family residential lots to the east.

A network of trails will be woven throughout the Sporting Club area, maximizing the natural landscape and topographic features. As presented in **Figure 1-22**, a wooded trail is proposed along the east side of the Kiamesha Creek, which forms the eastern border of this neighborhood.

As a separate alternative and depending on market conditions, an Age-Qualified Residential Community could be developed in this area.

#### *SUSTAINABLE DEVELOPMENT*

The Applicant for the proposed EPT Concord Resort has consciously sought to differentiate the Proposed Project from the projects that have come before. Consequently, the vision for the renewed EPT Concord Resort is dedicated to timeless, complementary fundamentals that will shape the legacy of the Project Site by setting a new regional standard for how development is done. Integrated throughout the CDP are strategies for environmental and economic sustainability that will enhance the value of the Project Site, as well as the broader community.

The sustainability initiatives included in the Proposed Project move beyond best practices by integrating a common set of sustainability practices and principles into each phase of the project, with the ultimate goal of producing a holistic sustainability plan that will be an integral part of each phase of the Proposed Project. The principles that drove the development of the CDP created a master plan that integrates the natural features of the land, arranging residential and commercial density in proximity to existing roadway infrastructure, where feasible, and

incorporating a wide variety of sustainable development initiatives for the short- and long-term conservation of resources.

The Project Site comprises developable land as well as areas restricted from development due to environmental constraints. **Table 1-6** presents the environmental deductions in developable land areas to account for environmental constraints to determine the “Net Site Area”<sup>1</sup>. Accounting for the 348.09 acres of constrained lands, the Net Site Area would be calculated as follows: Gross Land Area (1,538.57) – Environmentally Constrained Land (348.09) = 1,190.48 acres.

**Table 1-6  
Environmental Deductions**

<b>Site Feature</b>	<b>Acreage</b>
Waterbodies (land underwater)	37.45
Wetlands	282.01
Existing Public Roads	26.70
Utility Easements (public and private)	1.93
<b>Total</b>	<b>348.09</b>
<b>Source:</b> Hart Howerton	

The sustainability initiatives that are anticipated to be incorporated into the Proposed Project include:

*Site and Ecology*

- Cultivate biodiversity and enhance ecosystem function using intentionally applied, site-specific strategies
- Remove invasive species, reintroduce native species and establish an on-Site nursery or seed bank
- Protect major sensitive habitats and existing microhabitats
- Integrate the golf course, wetlands and lakes into the larger ecological landscape
- Dedicate a portion of land for community agriculture
- Reduce pollutants from the landscape and site maintenance (including toxic pesticides and de-icing salts)
- Design a pedestrian and bicycle friendly environment, with sidewalks, bikeways, and trail connections between neighborhoods

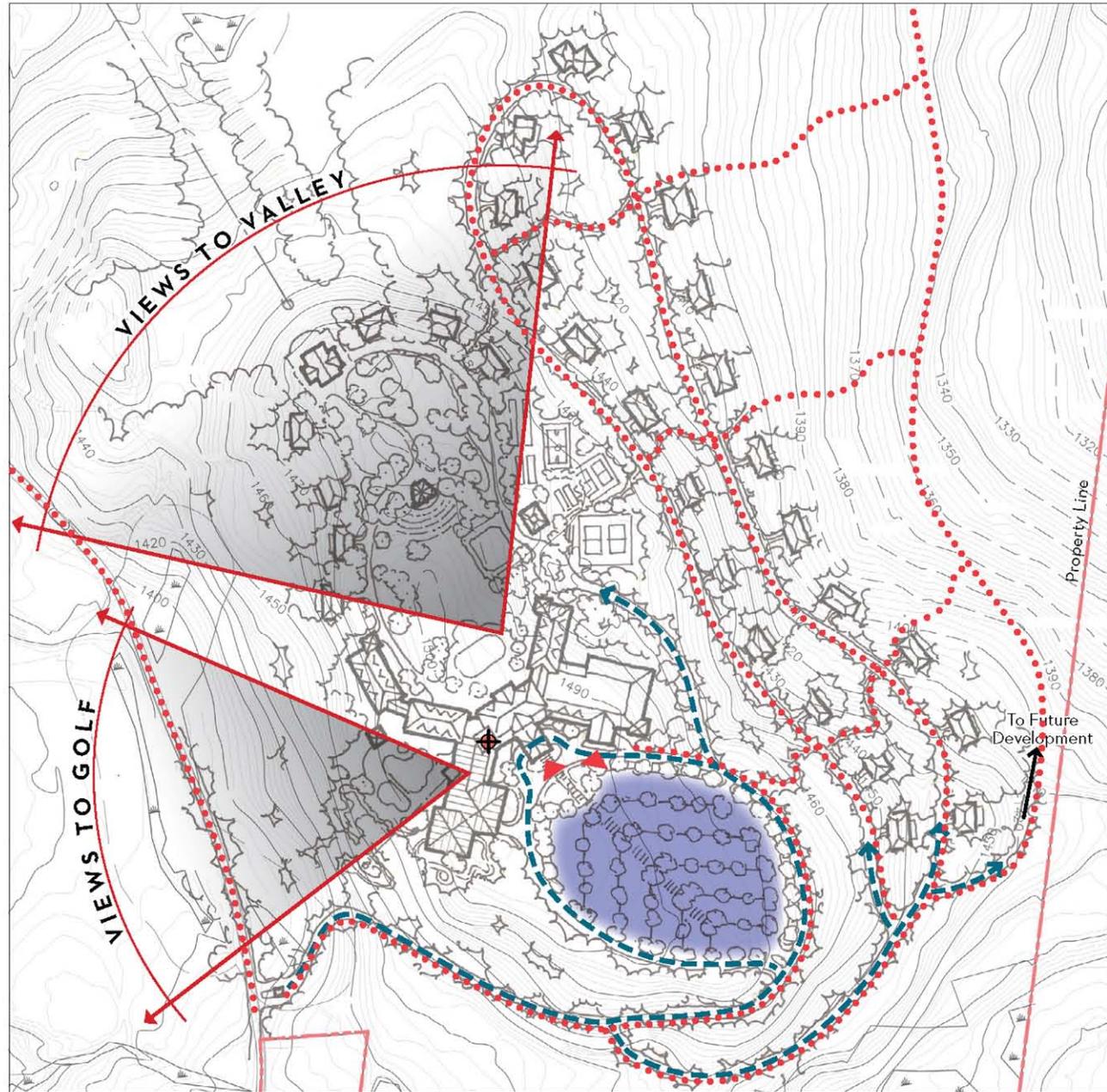
*Water and Wastewater*

- Maintain water balance of existing hydrology
- Use non-potable (gray) water for irrigation
- Monitor and manage irrigation via submetering

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<sup>1</sup> Net Site Area is defined in the Town of Thompson Zoning Code (§250-27.2 (B)(6)) as: “The gross area of the PRD site less the area of land underwater, wetlands (but not wetland buffer or adjacent area) as defined by New York State law, existing public roads and existing public and private vehicular rights of way, and existing private and public utility easements.”

LEGEND	
	Parking
	Circulation
	Hiking Trail
	Entry
	Architectural Feature



SOURCE: Hart Howerton



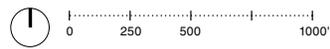
LEGEND	
1	The Lodge
2	The Spa
3	Cabins
4	Lots
5	Wetlands
6	Gatehouse
7	Fitness, Pilates & Yoga
8	Nature Center
9	Fish Camp
10	Outdoor Sporting Club Adventure



SOURCE: Hart Howerton



LEGEND	
	Open Space
	Circulation
	Hiking Trail
	Architectural Feature



SOURCE: Hart Howerton

Sporting Club Open Space, Trails and Circulation

Figure 1-22



- Maximize stormwater infiltration on the site by using permeable and semi-permeable surfaces wherever practicable
- Improve stormwater management to reduce existing erosion issues
- Improve water quality and protect aquifer through on-Site processing
- Develop landscaping guidelines for residences
- Create a drought management plan
- Develop water efficiency standards for fixtures and recommendations for residences
- Analyze the water cycle for resource efficiency opportunities, especially at the wastewater treatment facility

*Energy*

- Develop an architectural vocabulary that integrates appropriate style elements with sustainable features to reduce energy consumption
- Reduce energy use in private and public buildings without significant increases in first cost and maximize use of energy efficient measures (EEMs) and renewable energy technologies
- Take full advantage of New York State Energy Research and Development Authority (NYSERDA) incentives
- Implement central monitoring for facilities and infrastructure

*Materials, Waste and Indoor Environmental Quality*

- Minimize construction waste
- Identify local sources for reclaimed, salvaged or recycled content materials
- Use durable, high-quality and low volatile organic compound (VOC) materials
- Design buildings with high-performance air filtration systems
- Compost waste from the golf course, equestrian facilities and resort kitchens, with consideration of including future composting from residential and commercial facilities

*Transportation*

- Encourage and facilitate public transportation to, and shuttle service within, the EPT Concord Resort
- Create routes that feel rural, using split roadways, one-way roads and planted medians where practical

*Community*

- Integrate affordable workforce housing into the overall development to support a socially and economically diverse community
- Invest in local businesses for functions that can be outsourced to support the local economy
- Create and promote a natural-infrastructure strategy that protects agriculture and the environment as essential components of the tourist economy
- Create high-quality jobs for all industry sectors

## **LANDSCAPING/STREETSCAPE**

The landscape design for the EPT Concord Resort will provide a continuous link between the various neighborhoods throughout the Project Site. The natural features of the site will be restored and augmented to highlight the traditional Catskill landscapes and viewsheds that characterize the region. The landscape design for the Project Site has been guided by four principles:

### *PROTECT AND NURTURE A RESTORATIVE LANDSCAPE THAT SUSTAINS THE STREAMS, FOREST AND WETLANDS*

Preserving and restoring the natural features of the Project Site both improves their function and protects them. **Figure 1-23** presents the overall proposed landscape concept for the EPT Concord Resort. The landscape concept proposes to enhance the size and quality of many of the Project Site's natural features including plants, trees and forested areas while also considering the potential ongoing maintenance access, responsibilities and costs into the design. The Proposed Project proposes to minimize invasive and non-native species. Using native plants that blend with the existing vegetation restores healthy plant diversity and improves soil function. The plant palette will be rich in texture and variety.

The forest perimeter of the Project Site is proposed to be preserved and augmented creating a natural landscaped buffer between the Project Site and surrounding uses. Within the Project Site, views and viewsheds will be maintained to capitalize on the broad, sweeping views to the valley and across the golf course. The Proposed Project strives to maintain, rebuild or build anew the stone walls that are woven throughout the Project Site. These stone walls once represented division by property lines, but now will serve to protect and recall the historic character of the landscape.

The Applicant proposes to improve the quality and appearance of the Kiamesha Creek system and other waterbodies on the Project Site. This will be accomplished by establishing flow patterns and stabilizing the edges where water and land meet to help manage erosion and restore damage created by increased run-off from neighboring properties. The landscape plan proposes upstream solutions that mitigate further intrusions. Stormwater management utilizes systems that recharge the groundwater close to the source and uses Best Management Practices to treat and detain surface runoff.

### *CREATE A SIMPLE ROAD NETWORK THAT BLENDS WITH THE LANDSCAPE AND ORIENTS GUESTS*

The main entrance to the Proposed Project is expected to be via Joyland Road, which is proposed to be widened and enhanced to provide a clear and controlled entry for residents and visitors to the EPT Concord Resort. Joyland Road is proposed to have two lanes in each direction with a landscaped median. Vegetation on the roadway edges will be preserved and enhanced to provide a landscaped buffer between the road and adjacent land uses. The proposed roadway hierarchy is illustrated in **Figure 1-24**.

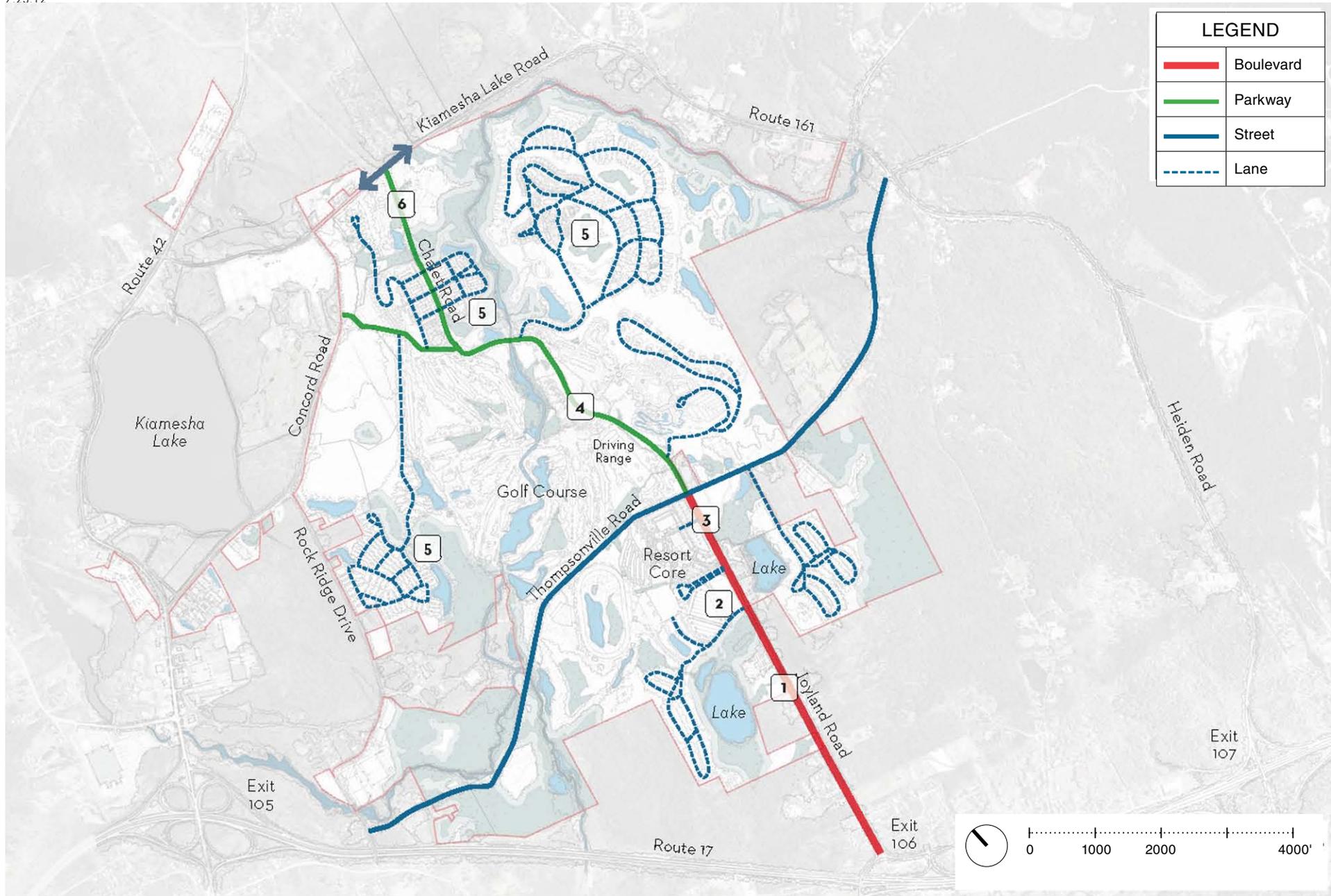
The entry boulevard will lead visitors to the Entertainment Village, and transition to a two-lane Parkway serving the other development areas of the EPT Concord Resort. This Parkway will provide a travelway through a variety of districts including the golf course, small residential villages and the proposed community farm.

LEGEND	
	Entry Boulevard
	Resort Roadways
	Neighborhood Roads
	Hiking Trail
	Village Street
	Pedestrian Street
	Recreation Areas
	Town Greens / Plazas
	Neighborhood Parks
	Streams & Ponds
	Key Entry Points
	Trolley Stops
	Wetlands & Wetland Setbacks
	Viewsheds



SOURCE: Hart Howerton





SOURCE: Hart Howerton



Residential neighborhoods will be served by streets and lanes providing access to the lower volume communities within the development. **Figures 1-25a through 1-25c** present options for roadway designs that could be used throughout the proposed EPT Concord Resort.

Roadway signage will be minimal and will provide only necessary directional information.

*PROVIDE A PEDESTRIAN FRIENDLY ENVIRONMENT, WITH STREETS, WALKING PATHS AND TRAILS*

Within the Entertainment Village, the pedestrian street will be an important outdoor gathering space providing access to retail establishments and recreational amenities. Streets within this district will provide opportunities for seasonal attractions including outdoor markets, kiosks and street performances.

The EPT Concord Resort will include an extensive network of walking, hiking and biking trails, as shown in **Figure 1-26**. The proposed trail system will connect the various areas throughout the Project Site and will have the potential to connect to regional trail systems including the Neversink and other area amenities. The primary spine will run north-south from the Route 17 Interchange to Kiamesha Lake Road. In addition, loop spurs will link from the main spine, providing opportunities for recreational hiking and biking throughout the EPT Concord Resort.

Class 1 trails are characterized as multi-purpose paths, with a 10-foot width, and generally follow the internal roadway network on Thompsonville, Joyland, Chalet and Kiamesha Lake Roads. Class 2 trails are proposed to be paved and striped bike lanes shared with roadways throughout the Project Site. The Project Site will also include hiking trails with an approximate 2- to 4-foot lane width. Walking trails, proposed with a variety of pervious materials, will provide links between districts.

*DESIGN SITE DETAILS AND AMENITIES TO BE CONSISTENT WITH THE CHARACTER OF THE CATSKILLS*

Site furnishings and amenities within the Entertainment Village will be designed with a modern aesthetic. Seat walls are proposed to define spaces and resolve small grade changes, eliminating the need for significant grading. The building design would minimize, to the extent possible, continuous uninterrupted building walls, by varying height, setback and façade treatments. Landscape details including plantings, water features, benches, pavers, and street lights would be more formal within the Entertainment District and less formal in the residential neighborhoods.

Outside of the Entertainment Village, in residential neighborhoods and other EPT Concord Resort areas, site details will be consistent and appropriate in scale with the adjacent land use. Walls, benches, fences and other site details will be designed to fit into the natural landscape. Street lighting would be minimal, focusing primarily on community gathering spaces.

The overall design philosophy is one of complementary design features throughout the EPT Concord Resort, and one that is consistent with the proposed land use types.

**RELATIONSHIP OF THE PROPOSED PRD ZONING AMENDMENT AND THE COMPREHENSIVE DEVELOPMENT PLAN (CDP)**

As previously noted, the PRD (§250-27.2) requires that the Applicant submit a Comprehensive Development Plan (CDP), which presents a conceptual development plan for the entire Project Site. The PRD requires that a CDP be approved by the Town Board. The purpose of the CDP is to

illustrate and describe uses proposed on the Project Site, the proposed roadways, circulation, site access, infrastructure, open space, and other site amenities. The CDP also includes conceptual “bulk and dimensional standards” and aggregate residential density for the Project Site.

As noted, the CDP for the EPT Concord Resort is illustrative and reflects a conceptual development scenario that will be built in phases over an approximately 10-year time horizon.<sup>1</sup> A central tenet of the PRD is that the CDP that is approved by the Town Board is intended to be flexible to allow for unanticipated site conditions, ownership or changing market conditions. In fact, the PRD specifically allows for some flexibility to accommodate changes in circumstances as long as the development is consistent with the PRD regulations in the Zoning Code and the CDP.

The PRD requires Town Board approval for the CDP, and each development phase requires Site Plan approval from the Planning Board. Here, the proposed ownership and the proposed land use plan are substantially different from that proposed by CALP (when CALP owned the property), and thus the Applicant – which owns a minimum of 1,200 acres and 18-hole golf course – is seeking approval of a new CDP. The new uses and development program proposed by the Applicant are required to align the development with current market conditions. These changes also warrant amendments to the PRD text. However, the CDP can be approved by the Town Board only after the Zone Text Amendments to the PRD have been adopted.

Accordingly, both the PRD text amendments and the revisions to the CDP are the subject of this DGEIS.

#### *PROPOSED BULK AND DENSITY REQUIREMENTS*

The lot and bulk requirements for development on the Project Site will comply with the requirements of the PRD zoning. As previously noted, future phases of development would be required to get Site Plan Approval from the Town of Thompson Planning Board. Each component of the Site Plan would be reviewed to assure zoning compliance.

#### **DEVELOPMENT OF PHASE 1**

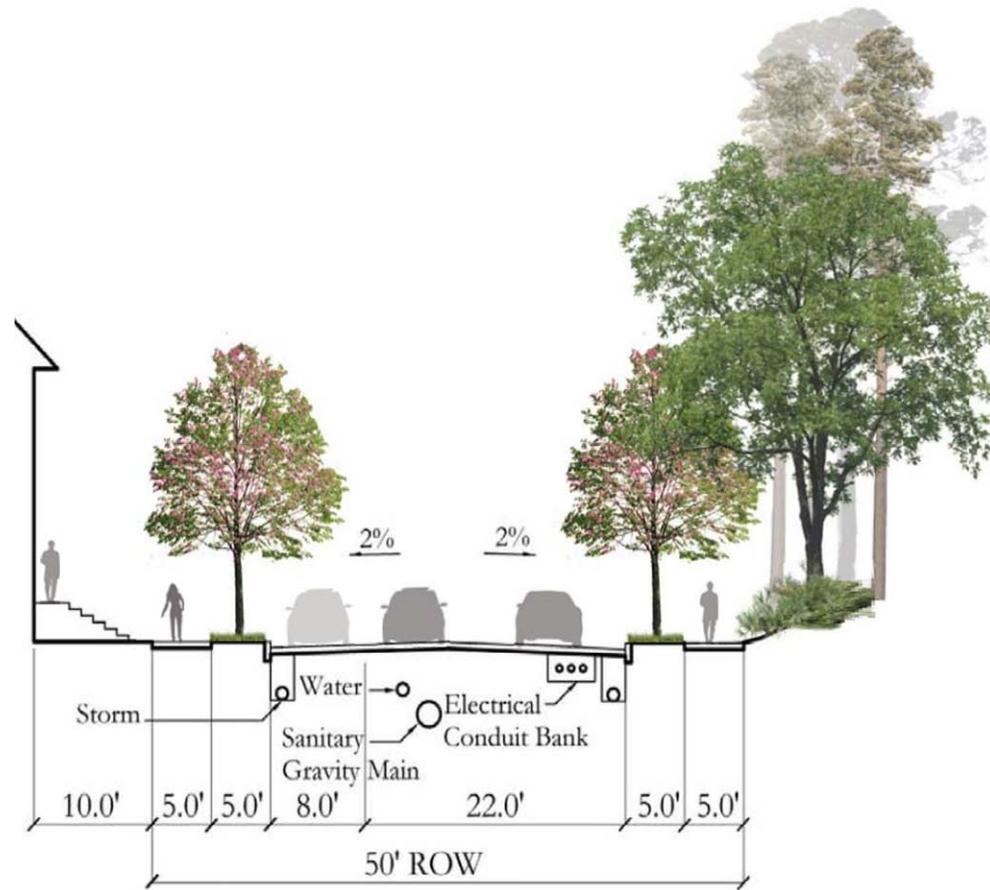
The Phase 1 Site is approximately 125 acres of a roughly 200-acre parcel that is proposed to be leased to MRMI for the development of a casino, hotel, harness horse racetrack, grandstand/showroom, simulcast facility, banquet event center, restaurants, and related facilities. The Phase 1 Site is located in the south central portion of the Project Site with access from Joyland and Thompsonville Roads. (**Figure 1-27**) The Phase 1 Site is bordered on the north and west by Thompsonville Road, on the east by Joyland Road, and on the south by wetlands. The Phase 1 Site also includes the associated support and back of house uses for the harness horse racetrack, stables, casino and hotel, as well as associated parking for all proposed uses.

**Table 1-7** presents the proposed Phase 1 development program.

Construction for Phase 1 will begin upon receipt of approvals and permits and is anticipated to be completed in 2014.

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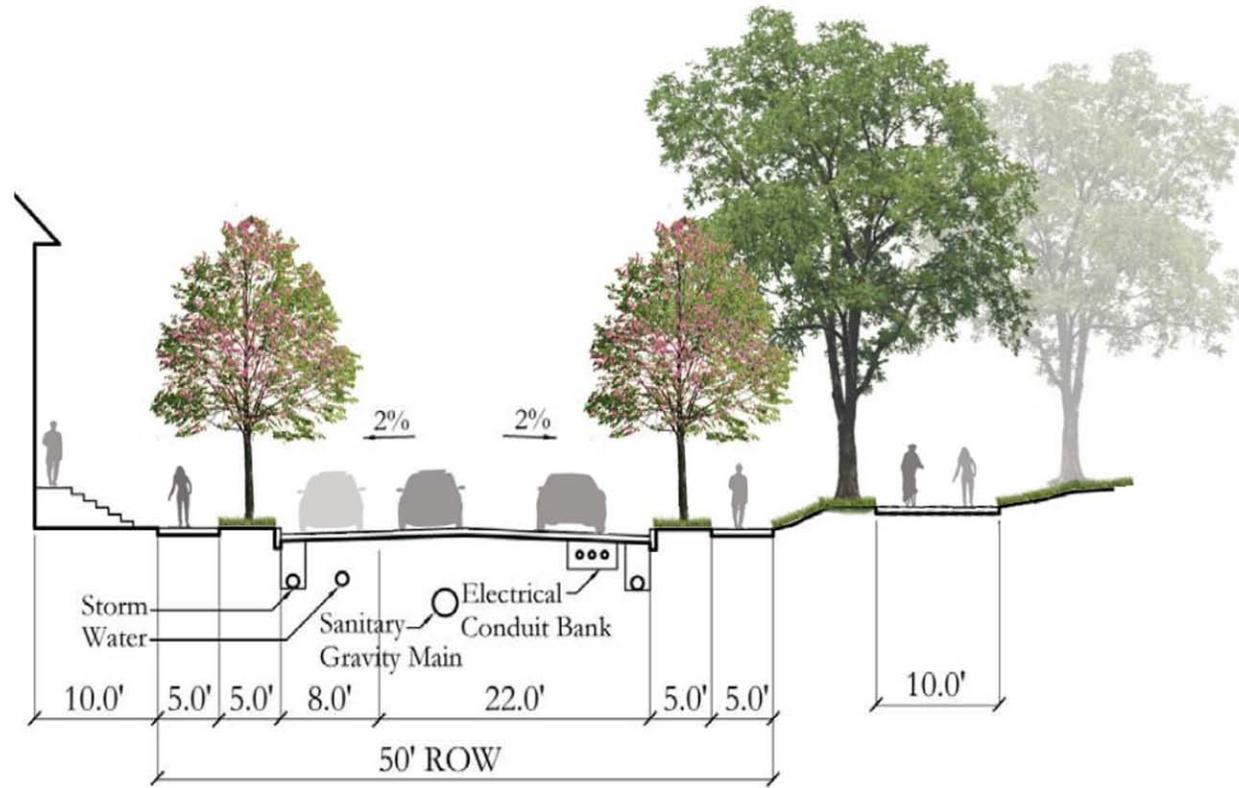
<sup>1</sup> Timing for full project build out is assumed to be 10 years for analysis purposes, but actual build-out would be determined based on market and economic conditions and timing for permits and approvals. For the purpose of this DGEIS/DEIS a reasonable and conservative development scenario has been selected for analysis.



Residential Street A: 2-Lane with Parking (50' ROW)  
 Curbed roadway with sidewalks separated by vegetated verge;  
 Stormwater piped to infiltration pools or retention basins

SOURCE: Hart Howerton

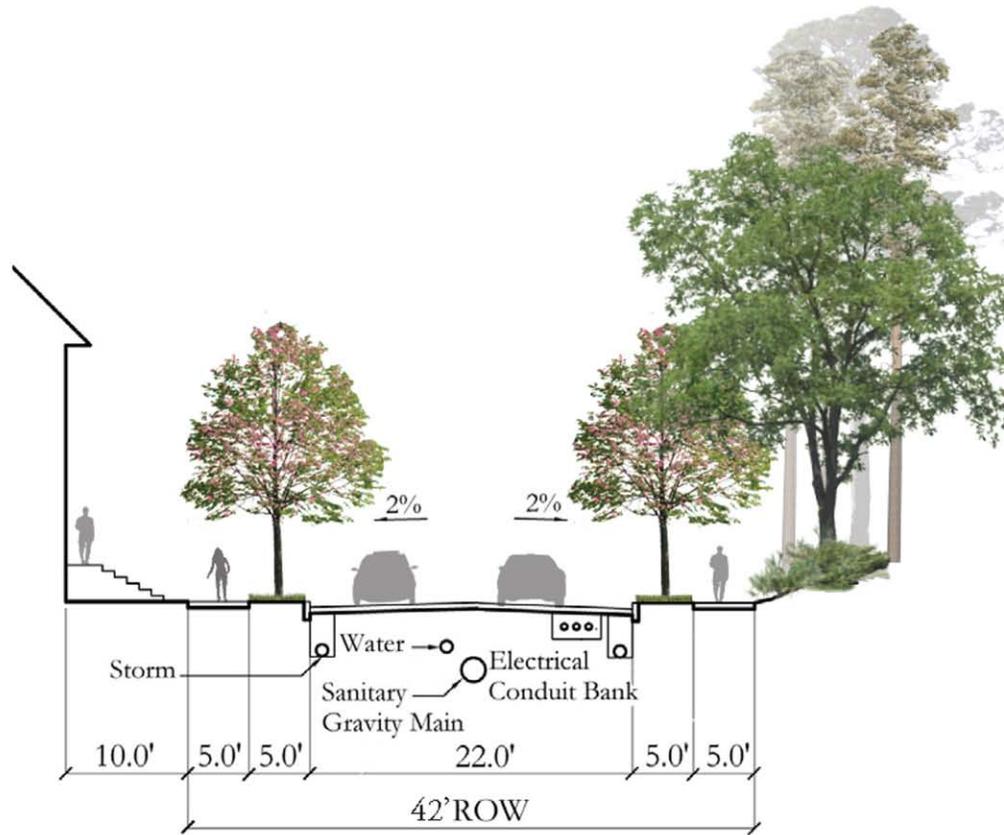




Residential Street B: 2-Lane with Parking (50' ROW)  
 Curbed roadway with sidewalks separated by vegetated verge;  
 Stormwater piped to infiltration pools or retention basins

SOURCE: Hart Howerton

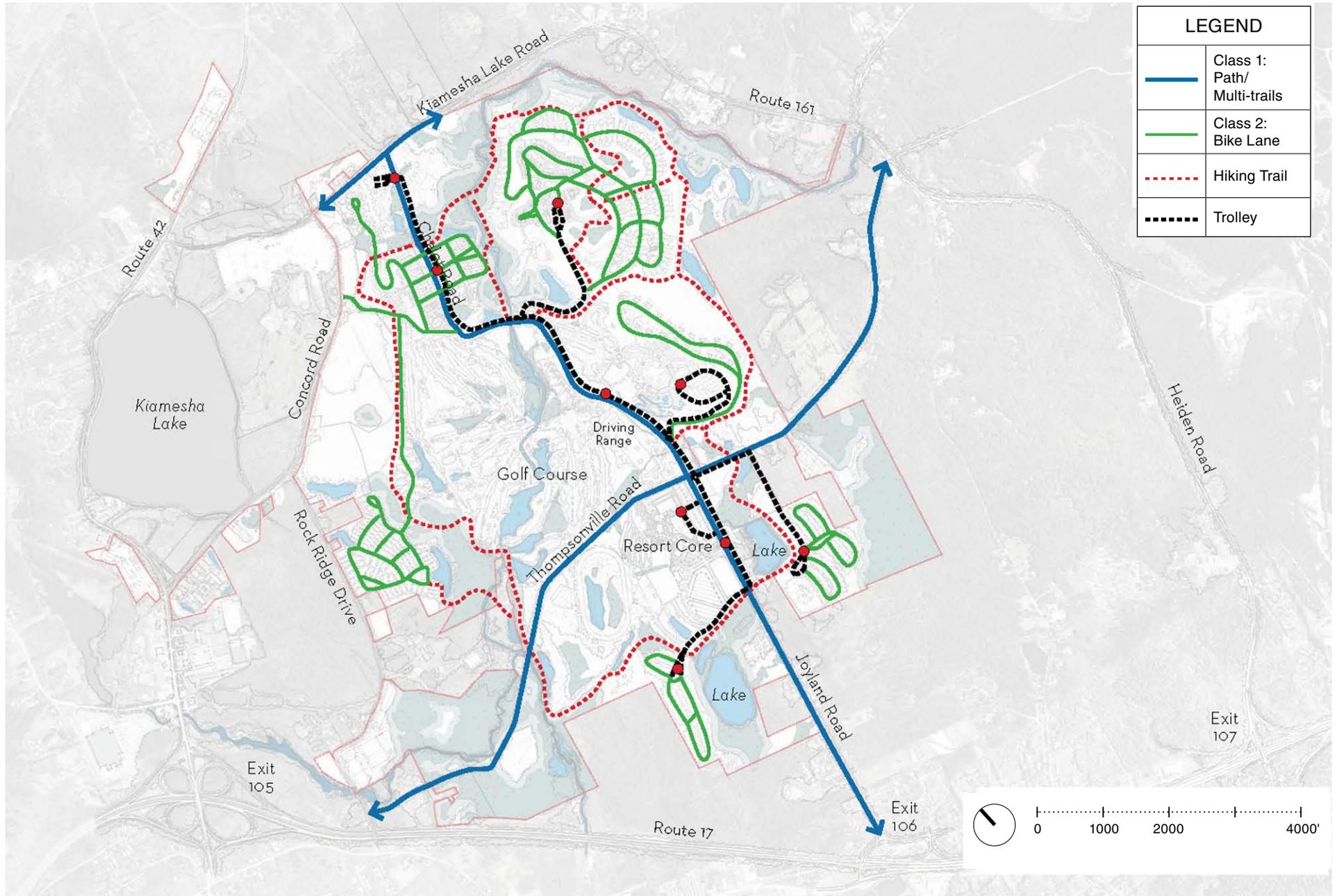




Residential Street C: 2-Lane with Unassigned On-street Parking (42' ROW)  
 Curbed roadway with sidewalks separated by vegetated verge;  
 Stormwater piped to infiltration pools or retention basins

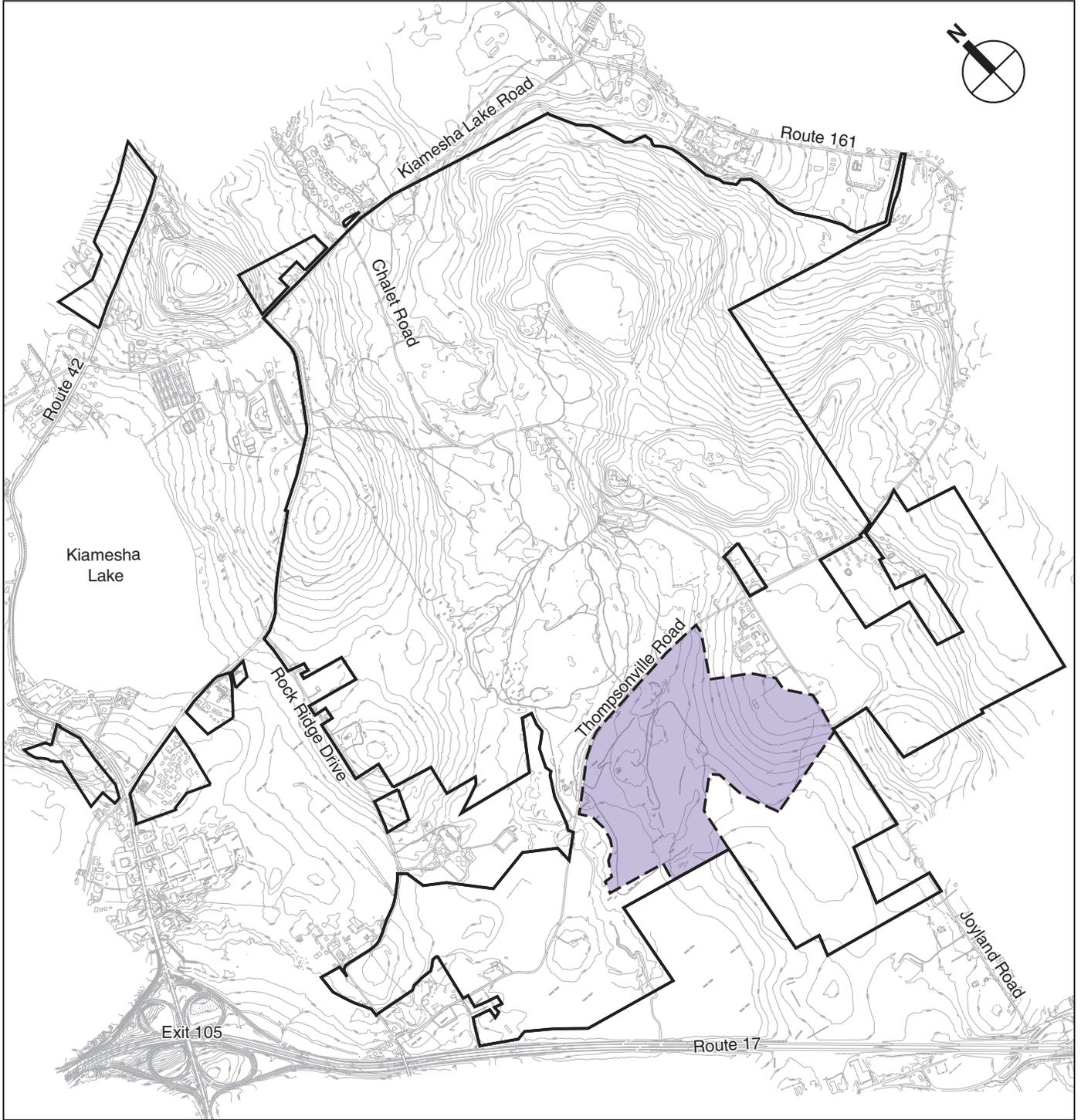
SOURCE: Hart Howerton



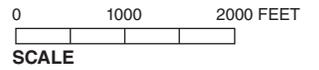


SOURCE: Hart Howerton





-  Project Site Boundary
-  Phase 1





**Table 1-7**  
**Phase 1 Development Program**

Program	Building Area	Parking
<b>Casino Resort Hotel (248 rooms)</b>	<b>143,400</b>	496
<b>Casino</b>	<b>374,135</b>	
Casino (2,150 VGMs)	74,000	308
Back of House	183,572	917
Grandstand/Showroom	53,409	167
High Limit Entertainment Lounge	4,746	(included in Casino)
Events Center	17,563	352
Fine Dining (160 seats + 14 in private dining room)	10,640	58
Buffet Restaurant (225 seats)	8,970	75
Entertainment Restaurants (202 seats)	6,367	68
Hotel Amenities (pool, spa, fitness)	14,868	248
<b>Subsurface Parking (three levels below the Casino)</b>	<b>454,890</b>	1,300 spaces
<b>Surface Parking</b>		2,000 spaces
<b>5/8 mile Harness horse racetrack</b>	<b>105,600</b>	
<b>Grandstand/Showroom (with seating for 500) (1)</b>	<b>18,866</b>	(see above)
<b>Paddock</b>	<b>28,361</b>	141
<b>Maintenance Building</b>	<b>16,264</b>	82
<b>Vehicle and Trailer Parking for Paddock and Main (2)</b>	<b>70,000</b>	125
Total for Phase 1	<b>1,017,050</b>	3,425
<b>Notes:</b>	(1) Includes 462 Fixed Auditorium seats, 40 banquet seats and eight table seats and associated support space. (2) Includes parking for 38 trailers and 30 vehicles.	
<b>Source:</b>	JCJ Architecture	

#### *DESCRIPTION OF PHASE 1 DEVELOPMENT PROGRAM*

Phase 1 of the Project proposes the Casino Resort. The Casino Resort will consist of 2,150 Video Gaming Machines (VGMs),<sup>1</sup> restaurants and food service, a 248-room hotel, events center, harness horse racetrack, grandstand/showroom and support buildings, and structured and surface parking on approximately 125 acres. **Figure 1-28** presents the Phase 1 Conceptual Site development plan.

Primary access to Phase 1 will be via a signed boulevard entry off Joyland Road. This main entrance will lead visitors and guests to the Casino Resort. A secondary entrance located just south of the main entrance will provide access directly to the visitor parking area. An employee/service access is proposed from Thompsonville Road, at the northern portion of the Phase 1 Site. Two additional points of entry are proposed from Thompsonville Road to provide

<sup>1</sup> VGMs include Video Lottery Terminals (VLTs) and Electronic Table Games (ETGs).

access/egress to the harness horse racetrack and associated support facilities. A bus loading/unloading area with canopy will be located to the south of the Casino Hotel.

The planning and layout of Phase 1 was heavily influenced by the varied site topography which was used to minimize the amount of grading required to develop the site and maximize the benefit of the existing topography. For example, the parking garage is proposed to be located underneath the podium level of the Casino to best utilize the change in grade between the buildings and the harness horse racetrack which is proposed for the most level area within the Phase 1 Site.

The proposed Casino Resort will be an architecturally significant marquis building with a contemporary design. **Figures 1-29a, 1-29b and 1-29c** present conceptual renderings of the proposed Casino Resort. It should be noted that final materials for the Casino Resort have not yet been chosen.

A detailed list and description of the Proposed Phase 1 Site development components is provided below:

*Casino and Restaurant/Food Service*

- 2,150 VGMs
- Center Bar Lounge with seating for 68 guests
- Fine dining – Shared lounge/bar supporting two restaurants, with seating for approximately 80 guests each and a private dining area for 14 guests
- Buffet with 225 seats
- Entertainment Restaurant with seating for 202, including bar seating
- Secondary entrance to the Casino with grab and go food service, located near the Bus Lobby for prepackaged food sales

*Back of House/Support Space*

- Employee services, including changing facilities, uniform service, and employee dining room
- Administrative offices on the Casino level
- Main kitchen producing most of the food for the food service venues
- Preparatory kitchens at the fine dining and entertainment restaurants
- Casino support and infrastructure will be located on the first floor under the Casino level.

*Hotel and Events Center*

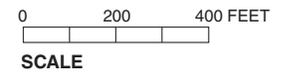
Hotel with 248 rooms (232 standard rooms, 16 suites). The Phase 1 hotel is proposed to be eight stories of guest rooms above the main level for a total of nine stories.

- Lobby / reception area located on the main level at the hotel access from the main entry
- Events center will include two dividable meeting rooms, one large ballroom with stage, dividable into three rooms and a pre-function area with an exterior terrace
- Spa and indoor pool located on the main level of the hotel.



SOURCE: JCJ Architecture

Phase I Area







SOURCE: JCJ Architecture





SOURCE: JCJ Architecture





SOURCE: JCJ Architecture

SOURCE: Hart Howerton



*Harness Horse Racetrack*

- Eight lane (and one safety lane) 5/8-mile harness horse racetrack with an asphalt apron for trackside viewing
- Paddock and maintenance buildings located to the north of the track
- Grandstand/showroom with seating for approximately 500 patrons for viewing a showroom for entertainment events (simulcast would be located below the Grandstand/Showroom).
- Snack stand

*Parking*

- Three levels of subsurface parking below the Casino level providing approximately 1,300 spaces
- Surface parking for approximately 2,000 cars

*Central Plant*

- Prepackaged Central Plant for boilers and chillers located near the Loading and Warehouse area.

*SUSTAINABILITY PLAN*

Consistent with that developed by the Applicant for the overall EPT Concord Resort and the sustainability goals set forth in the CDP, MRMI, the developer for the Casino Resort, is committed to integrating environmental sustainability practices into this initial phase of development. This will include using green materials and good design practices throughout the design and implementation of the development of Phase 1. Specific practices proposed to be incorporated into the Phase 1 development may include:

- Use of propane gas: The combination of propane gas and low emissions boilers will limit the amount of pollutants created by this facility and minimize air quality impacts;
- Use of window/glass glazing: Utilization of advanced glazing systems with increased R values to reduce solar heat gain, preventing unnecessary energy use;
- Landscaping – Mature trees will be left in place wherever possible to provide shade and reduce the heat island effect and, in turn, energy needed for cooling;
- Use of green materials in building interiors: Interior finishes will incorporate numerous materials that are green by design, including low VOC paints for the interior walls, ceilings which are made from partially recycled materials, and the use of wood species, which are harvested as recoverable species;
- Use of efficient LED lighting at specialty fixtures and exterior site lighting fixtures;
- Implementation of a storm water management plan to limit the pollutants generated from run off and assist in controlling excessive discharge;
- Use of efficient bathroom and faucet fixtures; and
- Ongoing operational initiatives including recycling of cans, bottles, grease recovery, etc.

As the Proposed Project develops, the Applicant will consider incorporating other sources of renewable energy, such as recapturing excess heat from the laundry facility for reuse, as practicable.

**F. ENVIRONMENTAL REVIEWS AND PERMITS**

To implement the Proposed Project, the Applicant would be required to obtain the permits and approvals presented in **Table 1-8**:

**Table 1-8  
Involved Agencies and Required Approvals**

Approving Agency/Department	Approval/Permit Required
<b>Town of Thompson</b>	
Town Board	Zoning Text Amendment
Town Board	Comprehensive Development Plan (CDP)
Planning Board	Site Plan Approval for Phase 1
Planning Board	Stripping of Land Permit
Highway Department	Road Improvement Permit
<b>Sullivan County</b>	
Division of Planning and Environmental Management	GML Section 239 Project Review
<b>New York State</b>	
Department of Environmental Conservation (DEC)	Public Water Supply Permit
DEC	SPDES Permit(s)
DEC	Article 15 Protection of Waters Permit
DEC	Article 24 Freshwater Wetland Permit
DEC	Water Quality Certification (Section 401)
DEC	Endangered and Threatened Species Review
DEC	Brownfields Cleanup Agreement (BCA)
DEC	CAFOS
DEC	Water Withdrawal Permit
DEC	Sewer Extension Approval
Department of Health (DOH)	Public Water Supply Permit
DOH	Sewer System Extension Permit
Department of Transportation (DOT)	Road Improvement Permit(s)
Office of Parks, Recreation, and Historic Preservation (OPRHP; also known as SHPO)	Section 106 and Section 14.09 Cultural Resources Review
NYS Racing and Wagering Board	Section 322 Approval
NYS Lottery	Section 1617A Approval
<b>Regional</b>	
Delaware River Basin Commission	Ground and/or Surface Water Withdrawal
Delaware River Basin Commission	Discharge of Pollutants into Surface Waters or Groundwaters of the Delaware River Basin
Delaware River Basin Commission	Total Dissolved Solids Determination
<b>Federal</b>	
U.S. Fish and Wildlife Service (USFWS)	Section 7 ESA Review (Endangered and Threatened Species)
U.S. Army Corps of Engineers (ACOE)	Individual Wetland Permit

**G. INVOLVED AND INTERESTED AGENCIES**

The Lead Agency for the State Environmental Quality Review (SEQR) of the Proposed Project is the Town Board of the Town of Thompson. Agencies that have permit-granting authority over the Proposed Project are described as Involved Agencies under SEQRA. Other related agencies are described as Interested Agencies.

**INVOLVED AGENCIES**

Members of the Town Board (Lead Agency)  
c/o Hon. Anthony P. Cellini, Supervisor  
Town of Thompson  
4052 Route 42  
Monticello, New York 12701

Marilee J. Calhoun  
Town Clerk, Town of Thompson, Town Board  
4052 Route 42  
Monticello, New York 12701

Nora Hughson  
Secretary, Town of Thompson, Planning Board  
4052 Route 42  
Monticello, New York 12701

Richard Benjamin Jr.  
Highway Superintendent, Town of Thompson, Highway Department  
4052 Route 42  
Monticello, New York 12701

Luiz C. Aragon  
Commissioner, Sullivan County Division of Planning & Environmental Management  
100 North Street  
Monticello, New York 12701

Robert A. Meyer, P.E.  
Commissioner, Sullivan County Division of Public Works  
100 North Street  
Monticello, New York 12701

Jennifer C.S. Brylinski  
Executive Director, County of Sullivan Industrial Development Agency  
One Cablevision Center  
Ferndale, New York 12734

Willie Janeway  
Regional Director, NYS DEC Region 3  
21 South Putt Corners Road  
New Paltz, New York 12561

NYS Dept. of Environmental Conservation Division of Environmental Permits  
625 Broadway  
Albany, New York 12233-1750

Jack Williams  
Regional Director, NYS DOT Region 9  
44 Hawley Street  
Binghamton, New York 13901

**INVOLVED AGENCIES (CONTINUED)**

Ruth Pierpont  
Director & Acting Deputy Commissioner, NYS Historic Preservation Office  
10 Delaware Avenue North  
Cohoes, New York 12047

U.S. Fish & Wildlife Service - New York Field Office  
3817 Luker Road  
Cortland, New York 13045

Nirav R. Shah, M.D., M.P.H.  
Commissioner, New York State Department of Health  
Corning Tower Empire State Plaza  
Albany, New York 12237

Gordon Medenica  
Director, New York State Division of Lottery  
One Broadway Center  
Schenectady, New York 12301

John Sabini  
Chairman, New York State Racing & Wagering Board  
1 Broadway Center  
Suite 600  
Schenectady, New York 12305

Carol R. Collier  
Executive Director, Delaware River Basin Commission  
25 State Police Drive  
P.O. Box 7360  
West Trenton, New Jersey 08628-0360

Chris Mallery  
Chief of Western Permit Section, U.S. Army Corps of Engineers  
New York District Regulatory Branch  
26 Federal Plaza  
Room 1937  
New York, New York 10278-0090

**INTERESTED AGENCIES**

James Carnell  
Chair, Town of Thompson, Zoning Board of Appeals  
4052 Route 42  
Monticello, New York 12701

William Culligan  
Chair, Town of Thompson, Conservation Advisory Council  
4052 Route 42  
Monticello, New York 12701

**INTERESTED AGENCIES (CONTINUED)**

Arnold Seletsky  
Deputy Supervisor, Town of Fallsburg  
19 Railroad Plaza  
South Fallsburg, New York 12779

Daniel A. Teplesky  
Superintendent of Schools, Monticello Central School District  
237 Forestburgh Road  
Monticello, New York 12701

William Culligan  
Superintendent, Kiamesha Lake Sewer District  
128 Rock Ridge Drive  
Monticello, New York 12701

Gordon Jenkins  
Mayor, Monticello Village Hall  
2 Pleasant Street  
Monticello, New York 12701

David P. Fanslau  
County Manager, Sullivan County  
100 North Street  
Monticello, New York 12701

Mark Freidland  
Chief, Monticello Fire Department  
23 Richardson Avenue  
Monticello, New York 12701

Scott B. Samuelson  
Chair, Sullivan County Board of Legislators  
100 North Street  
Monticello, New York 12701

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