

A. INTRODUCTION

The State Environmental Quality Review Act (SEQRA) and its implementing regulations require the consideration of project alternatives, which are formulated in response to potential impacts of the Proposed Project. The adopted Scope requires consideration of four alternatives for comparison to the Proposed Project. The alternatives are designated as either “No Action” (i.e., what land use would occupy the site should the Project not be approved and developed); “Alternatives to the Proposed Action,” which analyze impacts to the Project Site without the proposed zoning modifications to the Planned Resort Development (PRD); and “Alternatives to the Proposed Project,” which propose modifications to the Comprehensive Development Plan (CDP), including different site access and circulation patterns.

Potential environmental impacts from each of these alternatives have been analyzed to a level of detail sufficient to allow reasonable comparison with the Proposed Project.

Each of the subject areas analyzed in this DGEIS/DEIS has been analyzed for these alternatives. Using conclusions from the preceding chapters, the potential impacts of each alternative are compared to the potential impacts of the Proposed Project.

B. ALTERNATIVES**ALTERNATIVE 1 - NO ACTION ALTERNATIVE**

The No Action Alternative assumes that neither the PRD district nor the CDP would be amended and no development would occur within the 1,538-acre Project Site. The Project Site would remain substantially undeveloped, other than the existing structures. The No Action Alternative assumes continued use of the Monster Golf Course, with the Chalet building used as its clubhouse. The Applicant would continue to maintain the golf course and clubhouse, but would not make any substantial capital investments or upgrades to either of these facilities or their associated infrastructure. The flooding that occurs on the Project Site resulting in periodic closure of the Monster Golf Course, even after the most moderate of rain events, would continue. The vacant structures scattered throughout the Project Site would continue to deteriorate. Overall, this significantly underperforming property would continue to be an impediment to the goal of economic revitalization of the Town of Thompson specifically, and the Catskill region in general.

With the No Action Alternative, no impact to the natural environment would be expected, no additional project generated traffic would occur on the existing street network and no impacts on the demand for community services would be expected to occur. The No Action Alternative would also eliminate the potential for significant project-generated property, sales, and hotel occupancy tax revenue to the Town, County, School, and other relevant taxing jurisdictions. The

No Action Alternative would generate neither temporary construction jobs, nor permanent on-site part- or full-time employment.

The No Action Alternative does not achieve the Applicant's or the Town of Thompson's development objectives, and therefore the No Action Alternative is considered infeasible by the Applicant.

ALTERNATIVE 2 - DEVELOPMENT UNDER EXISTING PRD ZONING AND COMPREHENSIVE DEVELOPMENT PLAN

If the PRD text amendment and revisions to the existing CDP for the Project Site does not occur, this alternative evaluates the relative impacts of the Project Site being developed in accordance with the existing PRD regulations and the approved CDP¹.

The PRD zoning allows for the development to occur on selected sites within the Town, provided the Site and the proposed development meet certain criteria. Some of these criteria are excerpted below. The full PRD zone text can be found in the Town of Thompson Zoning Code, §250-27.2.

- The PRD must be located within the RR-1, SR, HC-1, and the HC-2 Zoning Districts²
- The minimum site area for a PRD is 1,200 contiguous acres in common ownership at the time of the original application for approval of a CDP, which must include at least one 18-hole golf course
- The maximum number of residential units is 4.0 units per acre of net site area
- The maximum aggregate total net floor area for residential accessory uses: 10 percent of the aggregate total net floor area of residential uses
- The maximum number hotel/motel units is 0.75 units per acre of net site area
- Maximum net floor area of casino uses is 450,000 sf
- Maximum aggregate total floor area ratio of permitted principal and permitted accessory commercial uses (except casino and hotel/motel accessory uses): 0.0175
- Maximum building height is 350 feet
- All uses shall be served by a central water and sewer system
- No less than 35 percent of gross site area shall be devoted to open space which may be used for public or private recreational purposes

¹ The existing CDP that is referenced in this analysis refers to the approvals that were granted in 2006 (as amended) for the CALP project. As noted elsewhere in this DGEIS/DEIS, subsequent to the 2006 CALP approvals, 1,538 acres of the original 1,700 acres in the PRD/CDP were transferred to the subject Applicant. This application does not impact the approvals that were granted for the remaining CALP property.

² A PRD may only be established in the HC Districts on lots or parcels having frontage on a State or County highway and which are located within 2,500 feet of the intersection of two or more State or County highways.

The approved CDP includes the following components:

- 1,500-room hotel with approximately 210,000 sf of casino and convention center
- 200,000 sf of convention center
- 3,000 residential units (both year-round and seasonal)
- Two golf courses and clubhouses
- 625,000 sf of destination retail
- 200,000 sf of back-of-house/support space
- 500 spa/lodge hotel rooms
- Harness Race Track and associated uses¹
- Various roadway improvements

The environmental impacts and mitigation for the PRD district and previously approved CDP were fully analyzed during the SEQRA process conducted by the Town of Thompson in 2005 and 2006 (with subsequent amendments). The Town of Thompson adopted an Environmental Findings Statement (November 21, 2006) affirming that the environmental impacts resulting from the PRD and CDP had been avoided, minimized, and/or mitigated to fullest extent practicable. A complete set of SEQRA documents related to that project can be found at the Town of Thompson Town Hall and on its web site.

Alternative 2, which proposes development under the existing PRD district and previously approved CDP, would not meet the objectives of the Applicant. The project phasing, configuration of uses, and adjacencies of the proposed CDP are purposeful in their design. As previously described, the eastern side of the Project Site would provide the resort-oriented uses while the western portion of the site would serve as the village side. All of the resort and entertainment uses are concentrated into a central core, with associated parking immediately adjacent to the entertainment uses.

The previously approved CDP proposed 30 percent more residential units than the Proposed Project. The Applicant evaluated the current and projected market demand and developed an overall program for the Project Site which would provide the most successful balance of uses. The PRD was specifically designed to allow for the opportunity to reevaluate the CDP and provide flexibility for each phase of development. This is why the PRD requires individual site plan approval for each phase of development. If subsequent phases are substantially different from (or exceeds in number) the components of the approved CDP, the Applicant is required to provide additional environmental review. By reevaluating the need and demand for certain uses, EPT Concord Resort is acting consistent with the implementing regulations of the PRD. The Applicant is applying to create a new CDP to better accommodate existing market conditions, develop a project that will contribute significantly to the Town of Thompson, and implement various components immediately, while rolling out the remainder of the complimentary project components over an approximately 10-year time horizon. To effectuate the proposed CDP, the language of the PRD is being amended.

¹ The CDP was amended in 2008 to include the harness horse racetrack and associated uses.

ALTERNATIVE 3 - ALTERNATIVE CASINO RESORT LOCATION (PHASE 1)

Alternative 3 describes optional locations for the Resort Core uses including the casino, hotel, harness horse racetrack, grandstand/theatre, simulcast facility, banquet event center, restaurants, and related facilities. **Figures 19-1 and 19-2** present these options, 3A and 3B, which assume that with the exception of these uses, the majority of the Project Site would be developed as described for the Proposed Project.

For both Options 3A and 3B, the Resort Core uses would be located in the south central portion of the Project Site with access from Thompsonville and Joyland/Chalet Roads.

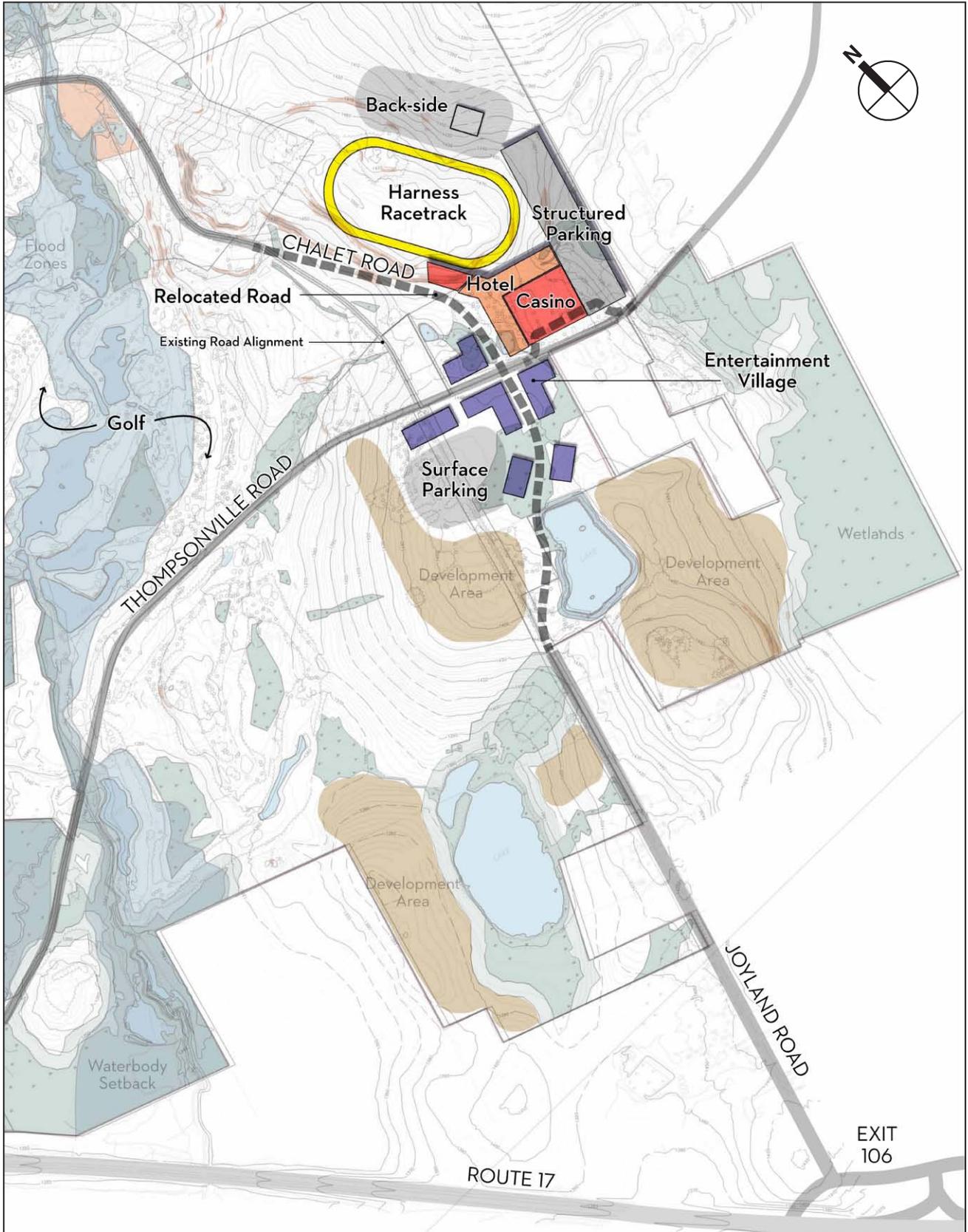
As shown in Figure 19-1, Option 3A proposes that the harness horse racetrack, Casino Resort, and structured parking would be located northeast of the intersection of Thompsonville and Joyland/Chalet Roads and the Entertainment Village uses would be located at the northwest, southeast, and southwest corners of the same intersection. Option 3A would require the realignment of both Joyland Road and Chalet Roads to the east both north and south of the existing intersection, to avoid an existing outparcel located northeast of the existing Joyland Road alignment. Additionally, a portion of Thompsonville Road east of the intersection with Joyland/Chalet Road would be realigned to the north of its existing right-of-way to avoid impacts to another outparcel. Surface parking would be located along the existing Joyland Road right-of way, south of Thompsonville Road. The realignment of Joyland Road in Option 3A would avoid tax parcels not included in the Applicant's land holdings, so no property acquisition would be required.

Figure 19-2 presents Option 3B for locating the Resort Core components. As shown, Option 3B proposes creating a loop road around these uses. This Option would require splitting Joyland Road, south of its intersection with Thompsonville Road into one eastbound leg and one westbound leg. The westbound leg of the new Joyland Road would be rerouted west of its existing right-of-way and would rejoin the eastbound leg just west of the existing Joyland Road alignment. Because Joyland Road would be a loop road and not a through road, Chalet Road would terminate in a cul-de-sac, just north of its existing intersection with Thompsonville Road. The harness horse racetrack, Casino Resort, and structured and surface parking would be located inside the new loop road, southwest of the existing intersection of Thompsonville and Joyland Roads. All but one of the proposed Entertainment Village uses would also be located inside the loop road. Additional surface parking would be located on the outside of the loop road, in the northeast corner of the development area.

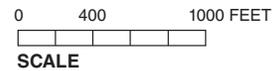
Using conclusions from the preceding chapters, the potential impacts of Options 3A and 3B were compared to the potential impacts of the Proposed Project. Options 3A and 3B would be expected to have similar environmental impacts for each subject area analyzed in the DGEIS/DEIS, with the exception of the following subject areas:

LAND USE, COMMUNITY CHARACTER, ZONING, AND PUBLIC POLICY

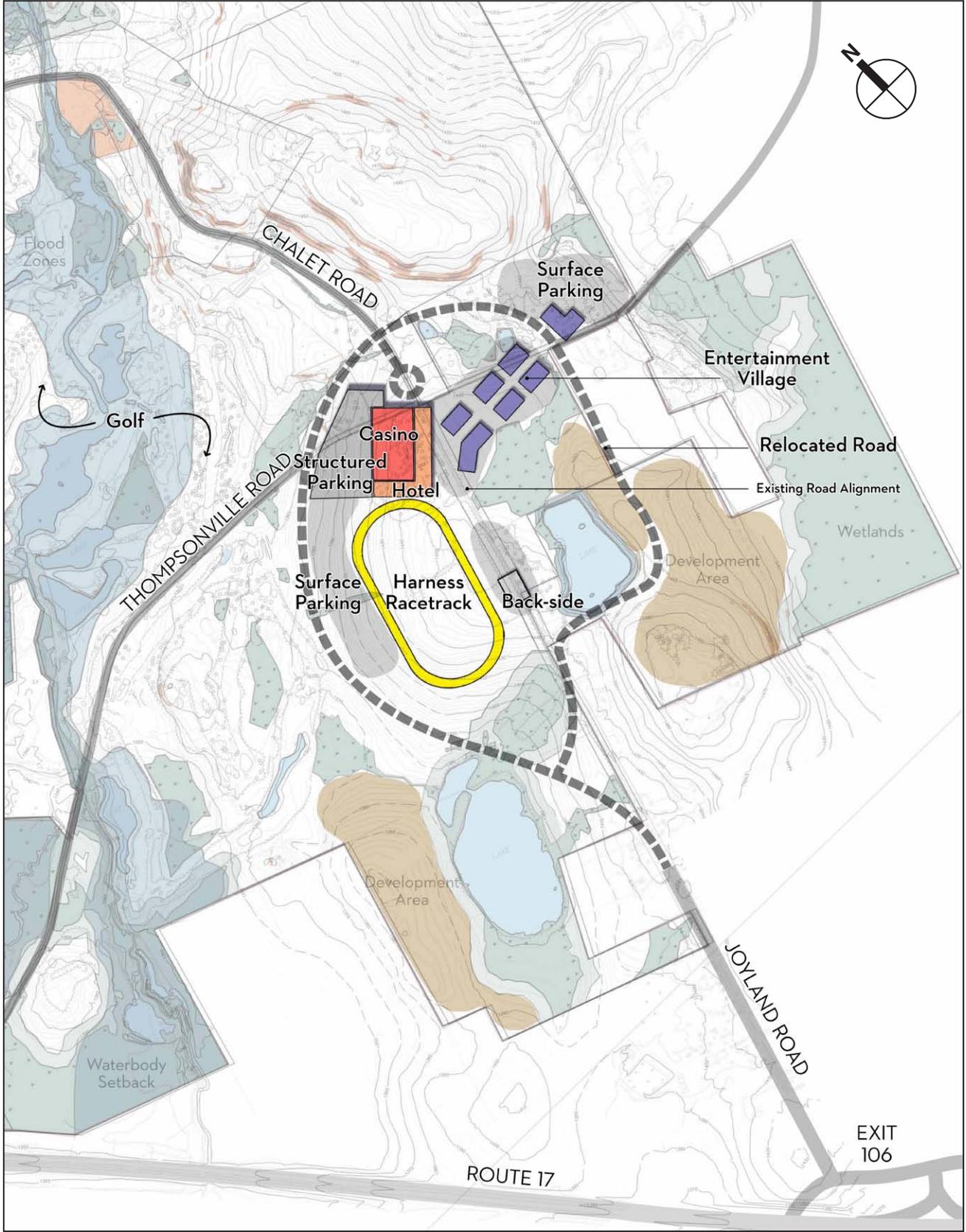
Due to topographical constraints described below, the layout of the uses presented in Option 3A would require the Casino Resort and structured parking to be separated from the Entertainment Village uses by the realigned Joyland/Chalet Roads. The design intent for the Resort Core is to create a pedestrian-friendly environment where visitors can travel freely between the Casino Resort and the Entertainment Village. The land use intent is to locate similar uses in close proximity of one another to encourage visitors to leave their cars and walk between



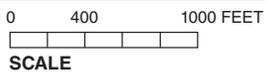
SOURCE: Hart Howerton



Alternative Hotel/Casino Location
 Option 3A
Figure 19-1



SOURCE: Hart Horton



Alternative Hotel/Casino Location
 Option 3B
Figure 19-2

entertainment venues. The Option 3A layout would make this pedestrian connection problematic.

Option 3B proposes to locate all but two of the Resort Core uses within an internal loop road. The two uses located on the exterior of the loop road would be surface parking and one of the Entertainment Village structures. Ideally, all of these uses would be located adjacent to one another, but the realignment of the road and the lack of a significant flat area results in a difficult arrangement of the structures. As such, the Option 3B layout, while more contained than that proposed for Option 3A, is not ideal for land use consistency.

GEOLOGY, SOILS, AND TOPOGRAPHY

The varied topography and lack of a flat expanse at the northeast corner of the intersection of Thompsonville and Joyland Roads would require significant regrading to accommodate the hotel, harness horse racetrack, and Casino Resort uses on the northeast side of Thompsonville Road proposed in Option 3A. The regrading effort in the northeast portion of the Resort Core parcel would be particularly extensive to accommodate the proposed parking structure. In the northeast corner of this area, there is not sufficient flat area to locate proposed roadways or structures outside of the waterbodies and wetlands, resulting in significant disturbances to these resources.

Similarly, the proposed layout for Option 3B would require significant regrading for the realigned loop road and the surface parking proposed in the northeast corner of the parcel. Because of the limited availability of flat/level land in this area, both the road bed and various structures would be located either within or immediately adjacent to wetlands and waterbodies.

Impacts to geology, soils, and topography are expected to be greater under these alternatives than with the development of the Proposed Project.

TRAFFIC

For Options 3A and 3B, the traffic analysis findings presented for Phase 1 (see Chapter 11 of this DGEIS/DEIS) would remain the same at all study locations except at the Thompsonville Road/Joyland Road intersection.

For Option 3A, the newly created intersection at Thompsonville Road/Joyland Road would likely need to be signalized with turn lanes provided to accommodate traffic traveling to and from the main entrance to the Casino Resort and parking structure entrance.

The Entertainment Village uses would be located across a well-traveled through road from the other Resort Core uses. As previously noted, the design intent for the Resort Core is to create a pedestrian-oriented environment, encouraging visitors to park their vehicles and walk to the various entertainment venues. When visitors are able to move freely between the Casino Resort and the Entertainment Village, internal trips are encouraged, reducing the overall number of vehicles traveling within the Project Site. Locating these uses on opposite sides of a travelway may impact the pedestrian environment negatively.

For Option 3B, the relocated roadway would require at least four new intersections as follows:

- The intersection of the loop roads
- Thompsonville Road and Joyland Road (west of the existing intersection)
- Joyland Road and Chalet Road, north of the cul-de-sac terminus of Chalet Road
- Joyland Road and Thompsonville Road (east of the existing intersection)

These intersections may require signalization and turn lanes to accommodate traffic demands.

Chalet Road would end in a cul-de-sac within the interior of the loop road, just at the entrance to the Casino Resort. Vehicles traveling south on Chalet Road would either terminate their trip within the Resort Core or have the option of bypassing the Phase 1 development area by taking the loop road. Although not detailed in Figure 19-2, to facilitate vehicular circulation within the loop road, the multiple circulation routes would be required to transverse the site in the north-south and east-west directions and may cause confusion for visitors to the Site.

SURFACE WATER RESOURCES AND WETLANDS

As shown in Figure 19-1, Option 3A proposes locating several structures and roadways within or directly adjacent to wetlands and waterbodies. The realignment of Joyland Road to the east of its existing right-of-way south of Thompsonville Road would require crossing a New York State Department of Environmental Conservation (NYSDEC) regulated waterbody. Also south of Thompsonville Road, both the proposed surface parking and several of the Entertainment Village uses would be located within or immediately adjacent to a United States Army Corps of Engineers (USACE) wetland. On the north side of Thompsonville Road, the proposed Entertainment Village use located west of the realigned Chalet Road would be within an existing USACE wetland, as would the Casino Resort and the structured parking.

Option 3A would have significant adverse impacts on regulated surface waterbodies and wetlands.

As shown in Figure 19-2, the loop road proposed for Option 3B would be located within the buffer and actually traverse an existing NYSDEC regulated waterbody in several locations. Several of the Entertainment Village structures would be located either within or immediately adjacent to existing surface wetlands, resulting in significant impacts on regulated waterbodies and wetlands.

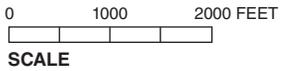
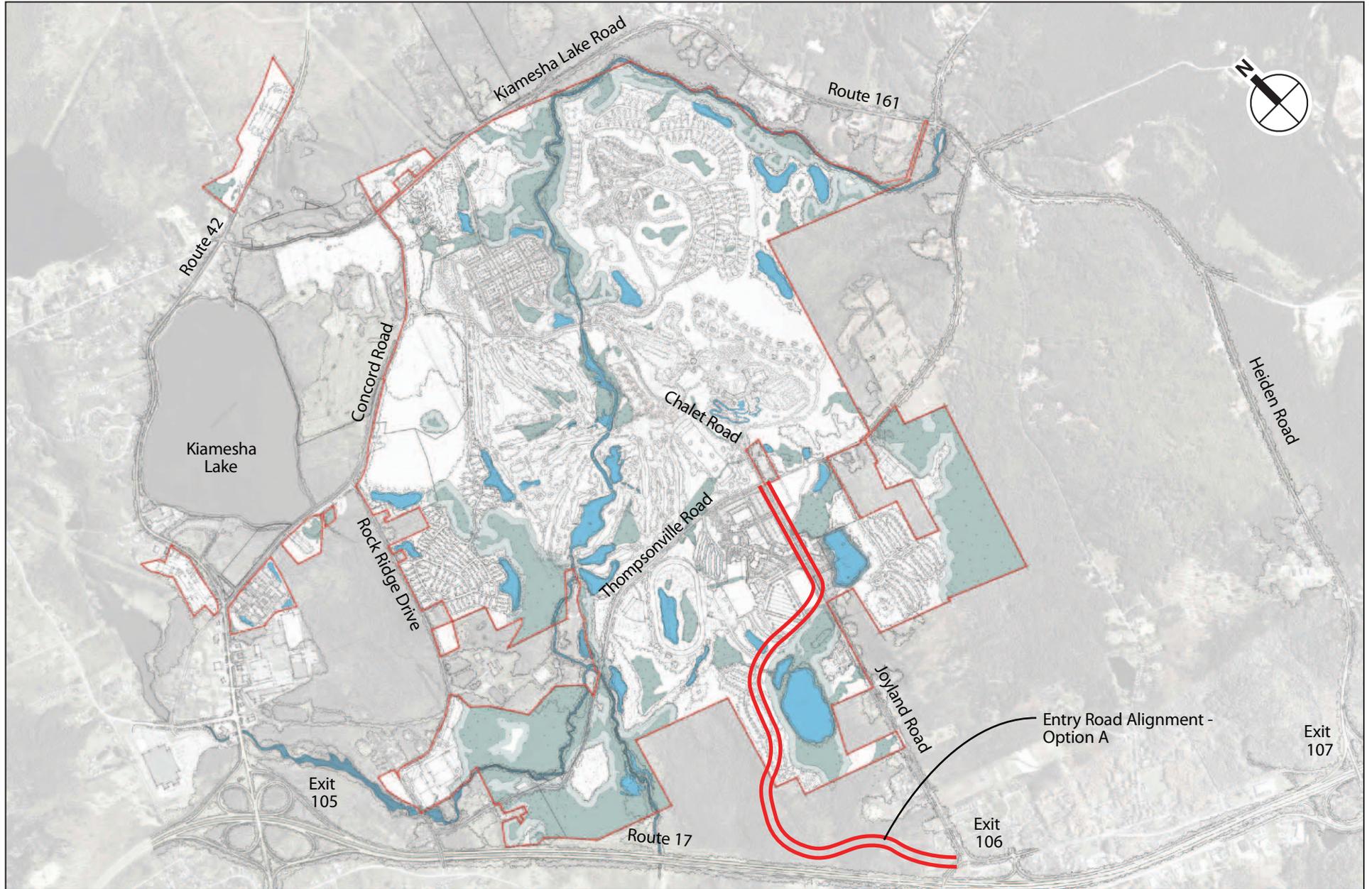
ALTERNATIVE 4 - ALTERNATIVE ACCESS (OPTION A)

Joyland Road is a two-lane country style roadway that enters the southern portion of the Project Site in the vicinity of the Phase 1 development area. It terminates in the center of the Project Site at its intersection with Thompsonville Road. Joyland Road is of varying widths with minimal infrastructure. Several active summer bungalow colonies and single-family homes are located along Joyland Road, with several structures located virtually at the edge of pavement. In addition, there are several vacant and deteriorating structures. All in all, improving Joyland Road to meet the traffic demands for the Proposed Project, the desired gateway character, along with respecting the historic and existing uses and users of the road presents significant challenges. Therefore, Alternative 4, or Option A, considers an alternative access road to meet the planning and design objectives of the EPT Concord Resort project (see **Figure 19-3**).

Option A would create a roughly 120-foot-wide access road that would cross Joyland Road close to its intersection with Cimarron Road. Option A would traverse several currently undeveloped parcels to the west of Joyland Road on its way to reconnecting with Joyland Road just south of the main entrance to the Casino Resort (see Figure 19-3).

LAND USE, COMMUNITY CHARACTER, ZONING, AND PUBLIC POLICY

Under this alternative, structures along the west side of Joyland Road that would be removed to accommodate its widening under the access road for the Proposed Project would remain in



place; these land uses would therefore be undisturbed. The Option A roadway would be located to the south and west of the existing camp community and residential properties on the west side of Joyland Road in areas that are currently undeveloped, changing the character of the land in this area. To the east of Joyland Road and north of Cimarron Road, two houses would be removed allowing the new access road to connect with Cimarron Road and ultimately the NYS Route 17 Exit 106 westbound ramp. This alternative would result in a slight difference in the land use and community character when compared with the Joyland Road access plan.

Zoning of the parcels over which the Option A access road would be built are expected to remain unchanged. This option would have no impact to any local or regional public policy.

COMMUNITY SERVICES

It is not anticipated that Option A would impact the ability of community service providers to serve the Project Site, nor would this alternative impact the Town of Thompson. As part of the site plan approval process with the Town of Thompson Planning Board, all proposed points of access and egress would be reviewed with the Monticello Fire Department and other community service providers to confirm that they are sufficient to accommodate emergency vehicles. As such, any mitigation that would be required would be built into the project design.

GEOLOGY, SOILS, AND TOPOGRAPHY

The area between the western edge of the pond and the Project Site boundary where the road would be built is rather flat. The elevation high point is 1,400 feet above sea level near the western Project Site boundary and gently declines to the east, towards the pond, to a low point of 1,376 feet above sea level. The slopes are 0-5 percent. Option A would result in greater disturbance to geology, soils, and topography than would occur under the proposed improvement of Joyland Road. Land disturbance required to implement Option A would be greater than under the Joyland Road access option.

NATURAL RESOURCES

Wildlife impacts associated with locating Option A on the west side of the pond rather than widening Joyland Road are expected to be roughly the same as that described for the Phase 1 development area and would affect the same suite of species. However, there would be more impacts to the vegetated communities than there would be with the Proposed Project. It would also fragment the forested area west of the pond, rendering it unsuitable to most of the woodland wildlife known to or expected to currently occur in the wooded areas of the Phase 1 site. It would also further isolate the pond from pond-breeding amphibians and disconnect the pond from upland, non-breeding amphibian habitat to the west.

SURFACE WATER RESOURCES AND WETLANDS

Preliminary assessment of wetlands and waters along the proposed route of the Option A roadway indicates that crossing of a wetland will be necessary at its southernmost location (see **Figure 19-4**). The remainder of the Option A roadway will be in upland habitat with the exception of crossing the stream that discharges to the large on-site pond (USACE Wetland #101). Although delineation of the off-site wetlands in and around the Option A route has yet to be completed, preliminary information suggests that potential wetland impacts will be comparable to the Joyland Road option.

STORMWATER MANAGEMENT

As with the Joyland Road route, development of the Option A access road would require the design of stormwater management practices and an erosion and sediment control plan in accordance with the NYSDEC State Pollution Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity. While the Option A route, which is longer than the proposed improvement of Joyland Road, will require additional and/or larger stormwater management practices due to the increase in impervious surfaces and new disturbance, the design, construction, and maintenance will result in no net increase in stormwater runoff. The stormwater management system would be designed to provide erosion and sediment control and provide post-construction stormwater treatment practices designed to capture and treat stormwater runoff, mitigating potential impacts associated with soil disturbance and impervious surfaces.

WATER SUPPLY

Option A would have no impact on the water supply to the Project Site. The only time a difference between this option and the Joyland Road route would be realized is if the water supply for Phase 1 were to come from the Village of Monticello and the chosen route was to cross NYS Route 17 in the vicinity of Exit 106. If this water supply option is chosen, all factors will be considered before the decision to install the pipe carrying water to the Project Site in either the Option A roadway or in Joyland Road is made.

SANITARY SEWER SERVICES

Option A would have no impact on the Proposed Project's sanitary sewer services.

ENERGY AND TELECOMMUNICATIONS

It is not anticipated that Alternative 4 would increase the demand for or use of energy on the Project Site. Similarly, the provision of or access to telecommunications technology would not be impacted if Alternative 4 were implemented.

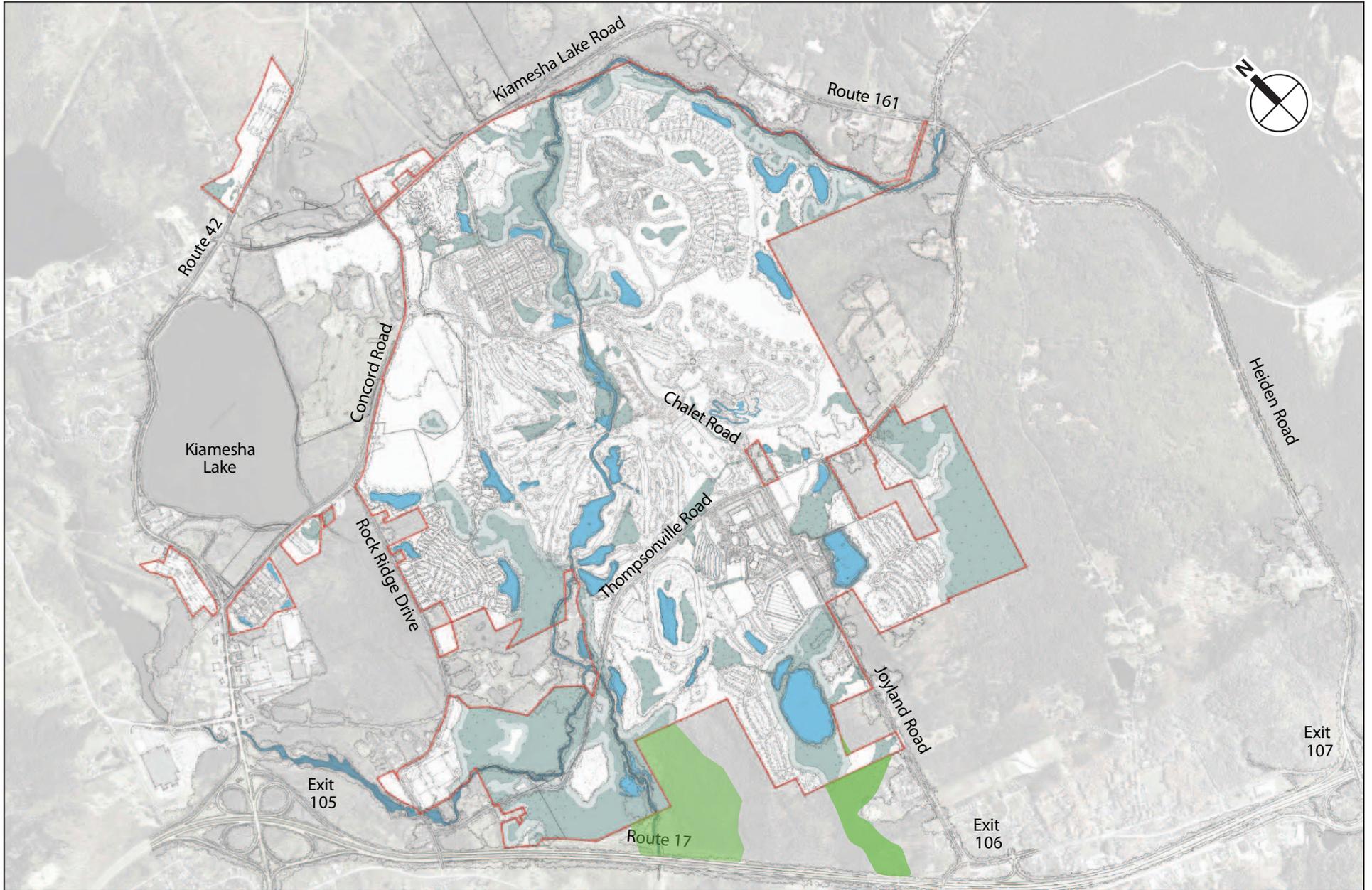
TRAFFIC AND TRANSPORTATION

Option A would provide a more direct "gateway" access for visitors to the Project Site. Similar to the proposed access, vehicles would exit NYS Route 17 at Exit 106, and would traverse undeveloped property until the visitor arrives at the Casino Resort. The traffic volumes would be comparable to the trips generated for the access presented as part of the Proposed Project. In addition, there would need to be an additional intersection and road improvements at the point where Option A diverges from Joyland Road.

As a road primarily dedicated to provide access to the Proposed Project, the separation from Joyland Road would reduce potential traffic conflicts between visitors to the Proposed Project and the residents and visitors to Joyland Road. Option A would be beneficial for the existing uses because it would maintain a rural residential ambience along Joyland Road.

AIR QUALITY

Similar to the Joyland Road route, it is not anticipated that Option A would result in a significant adverse impact to the air quality in the region.



0 1000 2000 FEET

SCALE



Potential Wetland Areas
(To be Confirmed in Field)

NOISE

Impacts to noise resulting from the development and use of Alternative 4 would be on par with those for the Proposed Project although potentially over a slightly longer duration as this alternative would result in a longer roadway. Significant adverse impacts are not anticipated.

ECONOMIC CONDITIONS

Alternative 4 would require the acquisition, by the Applicant, of eight properties on the west side of Joyland Road. These properties would be privately negotiated by the Applicant with each property owner. Other economic impacts resulting from the construction and use of Alternative 4 would be similar to those of the Proposed Project.

CULTURAL RESOURCES

While archeological investigations along the Option A route have not been completed, based on the results of the testing done elsewhere on the Project Site, if Option A were to be selected, there would need to be coordination with SHPO to coordinate the level of testing required. However, unlike the number of improved properties along Joyland Road, Option A would require few if any disturbances to improved land uses. Nonetheless, should this alternative be chosen to serve as the access to the Project Site, land along this route would need to be investigated for any archaeological resources that might be found.

With regard to historic resources, Option A would avoid the historic and/or potentially historic properties identified along Joyland Road and its environs. Similar to archaeological resources, consultation with SHPO would need to be commenced if this alternative were to be selected.

VISUAL RESOURCES

Similar to the Joyland Road route, it is not anticipated that Option A would result in a significant adverse impact to the visual resources in the area.

HAZARDOUS MATERIALS

Based on the location of Option A, and considering that the area is either undeveloped or supports only single-family residences, it is not anticipated that significant impacts would result from the presence of hazardous materials. The typical areas of concern associated with the current uses (i.e., residential fuel tanks and/or local dump sites) of the parcels associated with Option A can be addressed by the mitigation measures identified in Chapter 17, "Hazardous Materials," of this DGEIS/DEIS.

CONSTRUCTION

Construction-related impacts for Option A would be expected to be similar to those of the Proposed Project but would potentially occur over a slightly longer time frame due to the increased length of the road. All mitigation measures proposed for the development of the Proposed Project would be implemented under this alternative. *

