

Appendix A.4

Identification of Comparable Facilities to the Proposed Belleayre Resort

Project Technical Memorandum

To: NYCDEP – OEPA
Subject: Crossroads DEIS Review - Deliverable A.3 – Identification of
Comparable Facilities to the Proposed Belleayre Resort
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Introduction

In order to evaluate the potential for follow-on development (in addition to direct impacts), which could affect water quality, the consultants sought to identify a variety of four-season resort properties. The goal was to identify a group of properties, which are as similar to the subject property as possible. While the DEIS focused on “comparable” properties which were primarily ski-oriented, RKG sought to identify major resort developments which include the development of hotel and/or timeshare components, health spa facilities, multiple restaurants and golf courses, in close proximity to a ski area if possible.

Initial comparable properties were identified using internet searches and review of published data. Once a potential comparable property was identified, the consultants contacted the resort developer, manager and/or marketing staff to gather additional information on the development.

The survey of comparable properties focused on gathering similar information (to the extent possible) for each property. This information was used to develop a matrix of resort properties used for evaluating the proposed Belleayre Resort. Information gathered for the matrix includes:

- Property name and location;
- Year opened and the date of the last major renovation or expansion;
- Nearest major metropolitan area, and the distance to that area;
- The population within a 50- and 100-mile radius of the resort;
- The number of primary residences, as well as vacation homes available for rental;
- The number of hotel rooms affiliated with the development;
- The number of timeshare units which are part of the resort;
- The number of golf holes directly owned by the resort and/or available to resort guests;
- The availability of skiing as part of or adjacent to the resort;
- The availability of conference facilities;
- The availability of health spa and restaurant facilities; and
- Contact information.

The comparables identified through this research are summarized in the resort matrix attached to this Technical Memorandum. The comparables are divided into three groups: the Primary Comparables, which are considered to be the most comparable to the proposed development; and secondary comparables, which were ranked lower due to age, population density, or the amenities offered at the property, but are still considered relevant to the proposed Belleayre project; and tertiary comparables, which were reviewed and eliminated as potential comparables for the proposed resort development.

PRIMARY COMPARABLES

The following pages contain information on the resorts believed to provide the most relevant comparative basis for the Belleayre project. These facilities were chosen due to their four-season nature, similar on-site amenities, recent construction and/or redevelopment and regional characteristics. For each property, a description from the Resort’s web-site has been included, as well as some discussion regarding the property’s comparability to the proposed Belleayre Resort. Property-specific information is contained in the resort matrix attached to this Technical Memorandum.

As shown in Table 1, a total of nine properties were identified as being the most comparable to the proposed Belleayre resort development. Each of these properties has characteristics considered relevant to the analysis and evaluation of the proposed development.

Table 1 Matrix of Resort Comparison Properties			
Name	Location	Opened	Renovation
Belleayre Resort	Catskill Park, NY	2010	
Northstar Village	Lake Tahoe, CA	1972	2003
Old Greenwood	Lake Tahoe, CA	2003	
Mountain Creek Village	Vernon, NJ	2003	
Snowshoe Mountain	Snowshoe, WV		1998
Keystone	Keystone, CO	1970	1994
Steamboat Grand (ASC)	Steamboat Springs, CO	2000	
Westin Resort and Spa	Whistler, BC	2000	
Roaring Fork Club	Basalt, CO	1999	2000
Blue Mountain Village	Collingwood, ON	1970	2003
Source: RKG Associates, Inc.			

As shown in the Table above, two of the properties are in the Lake Tahoe area, and are actually “related” development projects. Three projects are in Colorado, and two are in Canada. The remaining two properties are located in the eastern United States, in New Jersey and West Virginia. Additional information on each of these properties is included in the comparables descriptions which appear on the following pages.

Northstar Village

Lake Tahoe, California

Northstar-at-Tahoe is a four-season resort area located in Lake Tahoe, California. The property was opened in 1972, offering a wide variety of winter activities. Guests and residents of Northstar also have access to the Tahoe Mountain Club, which offers golf, swimming, tennis, mountain biking, fly fishing and fine dining within driving distance of Northstar.

Despite its relative age, Northstar is currently undergoing a significant redevelopment in its Village area. East-West Partners is in the process of completing an expansion/ renovation of the village area that will add 200 new time-share housing units, an ice skating rink, additional dining and retail shops and underground parking.

Northstar-at-Tahoe is primarily a vacation home location. Most housing units are privately owned and not offered for rent. Currently, there are approximately 380 privately-owned units available for rent and 20 time-share units. However, these units offer a wide variety of on-site lodging options for guests. They range from hotel-style rooms to 4 bedroom condominiums. There are plans for significant expansion of the facility over the next few years, adding a mixture of nearly 1,500 single-family homes, condominiums and time-shares. There are also plans for a grand hotel in the Village area of the resort.

As mentioned, East-West Partners is currently redeveloping the Village area of the resort, adding new amenities for current owners and modernizing existing facilities. The construction is planned to start late 2003/early 2004. The new development will add additional housing, employee housing, and new amenities for residents/guests. This development prompted a judge to order a full EIS report due to the environmental sensitivity of the area and the strict laws of the state of California.

Northstar-at-Tahoe provides a relevant case study for the Belleayre project. Lake Tahoe is an environmentally sensitive area, governed by very strict laws. Northstar offers similar amenities to the proposed Belleayre project. The population counts within 50 miles of each resort are similar. Northstar's proximity to San Francisco is similar to Belleayre's proximity to New York City.

Promotional Information for Northstar Village

www.northstarvillage.com

Northstar is a four-season resort area and Northstar Village will be a four-season community - equally inviting on a spring afternoon or a winter evening. All four seasons of the year, you'll hear the call of the outdoors coaxing you from the comfort of this Tahoe dream resort. And the natural wonder will serve as the ideal backdrop for spending time with family and friends. Through vacationing at Northstar Village and membership in the Tahoe Mountain Club, every day will be an adventure as you golf, ski, swim, play tennis, mountain bike, fly fish, even dine in the presence of nature's majesty and the openness of the great outdoors.

Primarily a vacation home location, Northstar-at-Tahoe offers a wide variety of on-site lodging options for a great summer or winter getaway. They have hotel-style rooms in the village to 4-bedroom condominiums throughout the resort. In addition, there are plans for significant expansion of the facility over the next few years, adding a mixture of nearly 1,500 single-family homes, condominiums, time-shares and hotel rooms.

Old Greenwood

Lake Tahoe, California

North Lake Tahoe is a four-season resort area. Old Greenwood will be a four-season resort community. In short, Old Greenwood will be a golf course community developed around a Jack Nicklaus golf course. The development will offer 99 home site for purchase and development.

As with the Northstar Village resort, residents at Old Greenwood will have access to the Tahoe Mountain Club, which offers golf, swimming, tennis, mountain biking, fly fishing, and fine dining. Residents will receive access to the Northstar-at-Tahoe resort as well.

This development is part of East-West Partners regional development plan that includes several projects around North Lake Tahoe including The Highlands (a housing community at Northstar Village), Northstar Village (the mountain ski resort), Old Greenwood and Gray's Crossing (a golf course community).

This development is a 'piggy-back' of Northstar Village done by East-West Partners. Although these properties are geographically separated by approximately 10 miles, they can be viewed as parts of the same development, as both are being developed by East-West Partners, and both are being developed and marketed concurrently in close proximity to Northstar Mountain and Truckee, California.

Promotional Information for Old Greenwood

www.oldgreenwood.com

North Lake Tahoe is a four-season resort area and Old Greenwood will be a four-season resort community - equally inviting on a spring afternoon or a winter evening. All four seasons of the year, you'll hear the call of the outdoors coaxing you from the comfort of your Tahoe dream home. And the natural wonder will serve as the ideal backdrop for spending time with family and friends. Through ownership at Old Greenwood and membership in the Tahoe Mountain Club, every day will be an adventure as you golf, ski, swim, play tennis, mountain bike, fly fish, even dine in the presence of nature's majesty and the openness of the great outdoors.

Located on 600 acres of towering pines and sage fields with easy access off I-80 in Truckee, Old Greenwood will be Tahoe's most convenient resort community for residents of Sacramento and the Bay Area. And from your home at Old Greenwood you're no more than a short drive from downtown Truckee, the slopes of Northstar and the shores of Lake Tahoe. Natural beauty. World-class amenities.

Mountain Creek

Vernon, New Jersey

Mountain Creek is a mid-sized skiing venue located in the northwest portion of New Jersey, just 47 miles from Manhattan. Intrawest purchased a significant portion of the land at the base of the mountain and is in the process of developing the Mountain Creek Village. The village will be a dynamic location, offering the very best in accommodations and ski-village atmosphere.

Mountain Creek offers convenient access to both winter and summer activities. The ski area offers 45 trails and 11 lifts, with 3 terrain parks, the region's only superpipe and a tubing area. During the summer months, the mountain is used as a mountain bike/hiking facility. There are a dozen golf courses located near Mountain Creek, offering something for every golf ability, although the resort does not own a golf course. Mountain Creek is also located near a large state park and a commercial water park.

A 133-unit townhouse community was recently completed near Mountain Creek at Black Creek Sanctuary. An additional 100-unit 'grand hotel' style development is slated to begin construction in 2003. These facilities will host retail shops, conference space, fitness facilities, a spa and fine dining. Future development plans call for roughly 70 more townhouse units and an addition to the 'grand hotel' that offers an additional 75 units for purchase.

It is important to note that the owners of these units have the option to participate in Intrawest's rental program. Simply put, the owner has the choice of renting the unit as if it were a hotel room on the days the owner does not plan on using the unit. The owner always has priority of use. According to representatives from Intrawest, this program is very popular, with a vast majority of owners participating to take advantage of the income generated through renting.

This development is relevant to the Belleayre project due to the recent construction of the housing (2003 and 2004 respectively), the amenities available within close proximity to the Village, as well as the Village's relative location to New York City (roughly 50 miles).

Promotional Information for Mountain Creek

www.mountaincreek.com

It's been called "a mountain that shouldn't be missed", and rightly so. Because in winter, Mountain Creek is the very definition of the word play. With our state-of-the-art snowmaking, you can enjoy the very best winter has to offer; fantastic snowboarding and skiing at Transworld Snowboarding Magazine's #3 rated resort on the continent for best rail and jib variety in our terrain parks!

But winter is not the only season at Mountain Creek. Because surrounded by the green hills and beautiful back country of New Jersey, there are over a dozen great golf courses in our area. In addition, the Mountain Creek Waterpark will have your whole family grinning from ear to ear. And there are two State Parks nearby where canoeing, fishing, hiking, biking, picnicking and photography are ideal.

Your Mountain Creek vacation is complete when you come home to gracious comfort at the end of the day. Your spacious home away from home, whether it's a 1, 2 or 3 bedroom townhouse, is beautifully appointed, including digital TV's in the living room and bedroom, a gas fireplace with a slate hearth, digital phones in the living room and bedroom, high-speed Internet access, a fully equipped gourmet kitchen, and access to our outdoor heated pool and hot tubs and our outdoor firepit. Rest assured, you'll rest in comfort at our beautiful Black Creek Sanctuary townhomes.

Snowshoe Mountain

Snowshoe, West Virginia

Snowshoe Mountain has been in operation for years in the Alleghany Mountain range in West Virginia. However, the Mountain Village was purchased 5 years ago by Intrawest and has undergone significant changes since then. Located 80 miles from Charleston, West Virginia and roughly 4 hours from Washington, DC, Snowshoe offers convenient access to competition-class skiing in the mid-Atlantic. In addition, a new Interstate is expected to cut the commuting time to the Washington, DC area by nearly 1-hour.

In the past 5 years, more than 360 townhouses and condominiums have been built around the renovated Snowshoe Village, adding retail shops, a spa, 11,000 square feet of conference space and dining facilities. In addition, an 18-hole golf course was built, making Snowshoe a more complete four-season resort.

In addition to the winter activities at Snowshoe, which include skiing, snowboarding and snowshoeing, the region offers a wide range of summer activities. These include hiking, mountain biking, golf and canoeing. Current development plans call for a total of 1,200 new housing units and nearly twice as many skiing trails as are currently in use.

There are also 13 existing condominium complexes and 5 townhouse/single-family home developments on and around Snowshoe Mountain, in addition to the new development being completed by Intrawest at the Village. These facilities total more than 1,400 housing units. The Inn at Snowshoe is a full-service hotel located at the base of the mountain, offering hotel accommodations within the Village. As with all Intrawest projects, the owners of these housing units have the option to participate in Intrawest's rental program. The owner has the choice of renting the unit as if it were a hotel room on the days the owner does not plan on using the unit, although the owner always has priority of use. According to representatives from Intrawest, the vast majority of owners participate in the rental program to take advantage of the income generating opportunities.

The recent development at Snowshoe's central Village is similar in scope to the Belleayre project. The addition of the golf course increases the comparability. The Snowshoe development also includes similar amenities to Belleayre, such as meeting space, spa facilities and retail/restaurants.

Promotional Information for Snowshoe Mountain

www.snowshoemtn.com

The Village at Snowshoe is a centralized area where the heart of Snowshoe Mountain exists. Locals used to say you'd cheated death if you survived a winter on this mountain. Not anymore! These days, a winter up here is killer in a different way - killer fun! Nearly a mile above sea level, Snowshoe Mountain's village has a rustic, ski town feel - a taste of mountain living that only comes from life at elevation.

During the summer, the Village comes alive with excitement and activities for young and old. Enjoy street performers, jumps on the Eurobungy and train rides just to name a few.

The Village is also a place to relax after experiencing all the adventures Snowshoe has to offer. In the community atmosphere, hanging out with friends and family, enjoying great food at one of our 17 eateries, strolling through nearly a dozen specialty shops, splashing around at Split Rock Pools and watching the sunset across jagged Allegheny Ridges is as natural and refreshing as the mountain air. So, where ever you go up here and wherever you're from down below, the Village is sure to feel like home.

Keystone Resort

Keystone, Colorado

The Keystone Resort is located in popular Summit County, Colorado. Known for its large collection of world-class ski areas, Summit County is located roughly 70 miles from Denver. The resort has approximately 1,500 units available for renters, owners, and vacationers ranging from hotel-style rooms to mountainside cottages and condominium complexes. This wide variety of housing is located in several unique areas of the resort, but all focused around Keystone Village. Keystone also offers the largest conference capabilities in Colorado, with over 53 individual rooms totaling approximately 100,000 square feet of space. The resort accommodates large groups, small meetings, weddings, and everything in between.

Keystone is truly a four-season resort, offering a wide variety of winter and summer recreation amenities. Most notably, the resort is home to more than 2,000 acres of skiing during the wintertime that become hiking and mountain biking trails during the summer months. In addition, there are 36-championship golf holes available for play.

The mountain was opened for business in 1972. It has experienced regular investments by the property owners since then, including a \$700 million plan initiated in 1994. Most recently, an addition to the conference facilities was completed in 2001.

Keystone is also a strong comparable for the Belleayre project. The resort has comparable location and population characteristics. In addition, Keystone offers a similar variety of amenities. While the resort is larger in size than Belleayre, it provides a relevant comparison of longer-term follow-on development.

Promotional Information for Keystone Resort

www.keystoneressort.com

As the fourth most visited ski and snowboard resort in the nation, Keystone continues to evolve into a year-round world class destination. In addition to nearly 2000 acres of skiing spread over Keystone's three mountains, the resort offers world class dining, two championship golf courses, Nordic skiing and snowshoeing in the winter and hiking and mountain biking in the summer, as well as the largest conference center in the Rockies.

With its flagship Keystone Lodge by Rock Resorts, three additional hotels, and some 2,000 condominium bedrooms managed by the Company, Keystone is one of America's largest meeting and conference resorts. And with the \$11 million renovation of the Keystone Conference Center completed in 2000, Keystone has enjoyed a dramatic increase in conference business. In fact, Keystone hosted more than 600 conferences, conventions and functions last year, and group business now accounts for approximately half of the room nights booked at the resort.

With 36 holes of scenic golf in the summer, and world-class skiing and snowboarding in the winter, Keystone is also considered one of the top family resorts in North America all year long. Keystone offers something for everyone -from a variety of kids activities and programs to yoga, wine tasting, and fine dining for adults.

The resort also continues to lead the industry with environmental programs and initiatives, such as composting, computer recycling, educational programs and our partnership in the Snake River Global Sustainability Project.

development.

Steamboat Springs

Steamboat Springs, Colorado

The Steamboat Grand Resort Hotel offers 327 beautifully appointed guestroom accommodations, offering a variety of hotel rooms, one-, two-, and three-bedroom suites and luxurious penthouses. While these units are available for rent as hotel rooms, they are actually owned by individuals.

The Steamboat Grand operates similarly to the Intrawest properties. Each hotel room and/or suite is purchased by an individual owner and then offered for rent as part of an optional rental program. The owners block out the dates they plan on using their unit and rent the remaining dates.

To the outside observer, the property operates as a hotel. However, owners do not pay rental fees and have special privileges including a private owner's lounge and private equipment storage facilities.

The Steamboat Grand Resort offers convenient access to skiing and snowboarding, being located at the base of the Steamboat mountain range. In addition to the winter activities, the Steamboat Grand offers access to a wide range of summertime activities including a championship golf course.

The resort also offers all of the other amenities that make a facility truly luxurious, including a year-round outdoor pool with two large spas, massage therapy facilities, fine dining, retail shopping, a fitness center, valet & bell service and roughly 19,000 square feet of conference and meeting space.

The Steamboat Grand provides a relevant comparison to the Belleayre project. The hotel was constructed in 2000, making any analysis on environmental impacts timely. In addition, the facility offers a similar list of amenities to the Belleayre project.

**Promotional Information for
Steamboat Grand**
www.steamboatgrand.com

Tucked away in Colorado is a small town unlike any other. A place where western heritage and genuine friendliness are as honored as the values of a time gone by. And the Steamboat Grand Resort Hotel & Conference Center is in the center of it all with the services and amenities of a world-class resort. Surround yourself in luxury at The Steamboat Grand Resort Hotel & Conference Center.

As soon as you arrive, you feel the warmth and beauty of the mountain architecture ... from the Grand Lobby entrance and the 327 luxury guestrooms and suites ... to our Priest Creek Ballroom and 17,000 sq. ft. of meeting space.

Whether it's business, pleasure or both, the Steamboat Grand Resort Hotel is the perfect place for your next gathering, function or event.

Westin Resort and Spa

Whistler, British Columbia

The Westin Resort and Spa is located among the many resorts in the Whistler and Blackcomb mountain area. The Westin is the most recent slopeside development in the area, opening in April of 2000. The hotel has a total of 419 suites located in two towers.

The Westin Resort and Spa is the only full-service convention resort HSO (Hotel Strata Ownership) in Whistler Village. An HSO is fee-simple real estate in the form of a fully managed hotel and is an income-generating investment.

The Westin Resort & Spa is a unique HSO opportunity because it offers the combination of being a full-service, convention resort hotel and spa with an international reservations and sales network backed by the Westin brand name and Starwood guest loyalty program.

As an investor, owners are entitled to share in hotel profitability as well as use of their suite in compliance with covenant requirements.

To the outside observer, the property operates as a hotel. However, owners do not pay rental fees and have special privileges including a private library and a separate storage area for their ski equipment.

The Westin Resort and Spa is a comparable facility to the Belleayre project. On-site, the resort offers a similar level of amenities to the Belleayre project including a spa & health club, residential ownership opportunities, skiing access and dining facilities. Off-site, the Westin has access to golf courses, dining and retail establishments and other four-season outdoor amenities. The Westin is also located within close proximity to a large city, being located roughly 75 miles north of Vancouver.

Promotional Information for Westin Resort and Spa www.westinwhistler.com

This four-season resort was built on the last remaining mountainside site in Whistler Village, slopeside on Whistler Mountain and opened on April 3, 2000. It is situated approximately 120 km (75 miles) north of Vancouver via the Sea-to-Sky Highway (Hwy #99). The two-tower hotel has a total of 419 suites with 172 suites in the East Tower and 247 in the West Tower. Suites include 218 Junior Studio, 183 One-Bedroom, 14 Two-Bedroom and 4– 1,500+ square foot Mountain Suites. Included within these suites are 13 suites for guests with special needs.

The mountainside location of the hotel provides guests with coveted convenient access to both Whistler and Blackcomb Mountain skiing areas. (Whistler Mountain has a 7,100' vertical drop and Blackcomb Mountain has an 8,000' vertical drop, the highest in North America. Both mountains have a total 200 runs for skiing and boarding).

The hotel has also partnered with premier golf courses in the area, namely Nicklaus North Golf Course, Big Sky Golf and Country Club and Whistler Golf Club to offer real time reservations for tee times. (Nicklaus North is a par 71 course that winds alongside glacier-fed Green Lake. Of the 150 courses designed by Jack Nicklaus, this is the only course to which he has added his name. The Robert Cupp designed Big Sky Golf course has two full-length practice holes, seven practice bunkers, three chipping and putting greens and a grass tee driving range. Whistler Golf Club is a 6,676-yard Arnold Palmer designed course and features nine lakes, two winding creeks and rolling greens.)

Roaring Fork Club

Basalt, Colorado

The Roaring Fork Club is a golfing and fishing resort located 15 miles outside Aspen, Colorado. The resort opened in 1999 with 48 log cabins and an 18-hole Jack Nicklaus signature golf course. The resort also offers a wide variety of fishing venues. The resort also has small meeting facilities and a health and wellness spa.

Of the 48 log cabins at Roaring Fork, 30 are individually-owned. An additional 18 cabins are being sold as 1/4 share ownership opportunities. There are also 12 suite-style units located in the property's grand lodge, which are 1/6 share units. According to resort staff, only owners and owner-sponsored guests are allowed to stay in Roaring Fork. However, there appears to be a rental program currently in place.

In addition to the summer activities and amenities offered on-site at Roaring Fork, owners and guests are within 15 miles of Aspen, which offers a broad range of four-season activities.

Roaring Fork offers a good comparison to Belleayre for several reasons. First, the resort is one of the few that were identified that offer 1/4 and 1/6 time shares. Almost all of the other resorts evaluated as part of this Technical memorandum have full-ownership opportunities where the owner can participate in a rental program, or weekly timeshares. Second, Roaring Fork boasts world-class summer amenities including several fly-fishing venues and a championship-level golf course. Also, the resort opened in 1999, with new housing and amenities currently being developed, which makes a review of follow-on development timely. Finally, the resort has access to year-round recreation due to its proximity to Aspen, Colorado. The major limitation of this property from a comparability perspective is its size, since the property has only a total of 60 units.

Promotional Information for Roaring Fork Club

www.roaringforkclub.com

When Roaring Fork Club developers Jim Light, Jim Chaffin and David Wilhelm walked the 282 acres of ranchlands and river that would become the Roaring Fork Club, their vision began to evolve. They wanted to create a unique golf and fishing experience in an environment that fostered family traditions and neighborly interaction. Unlike other private golf courses that focused heavily on real estate, this invitation-only club would feature a limited number of well-crafted log cabins and suites for members' lodging. Their inspiration: the Great Camps of the Adirondacks and genteel porch societies of the last century.

Naturally, they envisioned a golf course of the highest quality, and hence, invited the best in the business to work his magic on the land. The resulting 18-hole Jack Nicklaus Signature Course blends effortlessly into the lush mountain valley terrain and provides a fortunate few the unhurried pleasure of a challenging game.

Understanding that traditions, like heirlooms, should be passed from one generation to another, the three men sought to create an unparalleled experience for anglers, young and old. With a healthy stretch of the famed Roaring Fork River already meandering through the property, they commissioned a spring fed creek, a fishery and nine well-stocked ponds.

Almost a fairy tale come true, the Roaring Fork Club is a magical blend of rustic simplicity and refinement, spectacular wilderness and cultivated society set 16 miles west of Aspen in the charming mountain town of Basalt.

Blue Mountain Village

Collingwood, Ontario

Blue Mountain Village was opened in 1970. It is located 150 miles north of Toronto, Ontario, Canada along Georgian Bay. The resort offers a wide variety of summer and winter activities including golf, mountain biking, fly-fishing, skiing, snowtubing and snowboarding.

There is a wide variety of housing at Blue Mountain, from hotel-style rooms to single-family homes. As with most Intrawest properties, almost all of Blue Mountain's residential units are full-ownership opportunities with the option to participate in the resort's rental program. There is one 93-room traditional hotel at Blue Mountain.

Intrawest is currently in the process of revitalizing the Village area of Blue Mountain. The plans call for the expansion and modernization of existing amenities and buildings in the Village.

The resort offers a relevant comparison to the Belleayre project. The resort has been in the process of adding new time-share style housing over the past few years. The renovations in the Village are similar to those occurring at Mountain Creek and Snowshoe. In addition, the resort offers the best comparison, in terms of proximity to a major metropolitan area and population density. However, there may be some comparability issues due to the bay-front location of the resort.

Promotional Information for Blue Mountain Village www.bluemountain.ca

Conveniently located only 90 minutes north of Toronto, Ontario, Canada, Blue Mountain is the perfect four-season resort. The setting can't be beat, 850 spectacular acres nestled between the shores of Georgian Bay and the picturesque Niagara Escarpment. Blue Mountain's mix of leading edge conference facilities, first class accommodation and incredible recreation, ensures that your experience at our resort will be entertaining and rewarding, any season of the year.

There's a whole world of excitement and relaxation waiting for you amidst the glorious scenery of Georgian Bay and the Niagara escarpment. When the snow melts at Blue Mountain, it reveals a whole new world of excitement. From traditional summer sports to more extreme adventures, we offer a range of activities sure to impress every age group. The great Green Season adventure at Blue Mountain Resort starts in the new Village shops, restaurants and clubs and goes on from there. There's swimming and sailing on our secluded beach on Georgian Bay, hiking and mountain biking, kids' camps, spas, and antique hunting. In fact, there's so much to enjoy, you might want to ask our activities coordinators to organize it all for you.

SECONDARY COMPARABLES

This next group of resorts is considered adequate comparables to the Belleayre project. Unlike the primary group, this group only shares some similarities to Belleayre. These resorts will still likely produce a suitable comparison for the Belleayre project. However, certain factors such as age, location and size of the projects may make certain comparisons less appropriate. For each property, a description from the Resort's web-site has been included.

Fairmont Chateau Whistler

Whistler, British Columbia

The Fairmont Chateau Whistler is an all-season luxury resort located in the Whistler/Blackcomb resort area in British Columbia, Canada. The resort opened its doors in 1989. The Fairmont Chateau Whistler is within walking distance to the village of Whistler, roughly 75-miles from Vancouver.

In 1997, the resort was expanded. The addition included 221 new guest rooms, a 12,000 SF ballroom, four additional meeting rooms and a larger spa. In total, the resort has 550 guest rooms, approximately 25,000 SF of meeting space and 2 dining establishments.

The resort offers some summer and winter activities and amenities including ski access to the renowned Whistler Mountain, a spa & health club and a Robert Trent Jones Jr. championship golf course. However, guests of the Fairmont Chateau Whistler have access to a wide range of activities in the Whistler/Blackcomb area.

The Fairmont Chateau Whistler is comparable to the Belleayre project based on its relative location, recent expansion and available on- and off-site amenities. However, this resort does not offer residential ownership opportunities. Because of this, it is considered to be less comparable.

Promotional Information for Fairmont Chateau Whistler www.fairmont.com

The Fairmont Chateau Whistler is an all-season luxury resort. Since opening its doors in 1989, The Fairmont Chateau Whistler has been Whistler's landmark hotel. Nestled at the base of breathtaking Blackcomb Mountain, the Chateau is just a five-minute walk from the village of Whistler, and 75-miles from Vancouver along the scenic Sea to Sky Highway, considered one of the most scenic drives in North America.

In building The Fairmont Chateau Whistler, the architectural mandate was to infuse the charm and style of other Canadian chateaux built earlier in the century, into a modern structure. Rustic Canadian antique pieces representative of the country in its youth were collected in Labrador, Baffin Island, the Laurentians, the Maritimes, rural Ontario and the West Coast. The interior design was under the direction of Frank Nicholson, internationally acclaimed interior designer, best known for Ritz-Carlton hotels and many of the Four Seasons hotels throughout the world.

Bearing the signature style of The Fairmont Chateau Whistler, the grand decor brings the old and new together in a seamless meld of historical style and modern beauty. Nestled at the foot of Blackcomb and Whistler Mountains, The Fairmont Chateau Whistler is located in one of North America's top resort destinations. Unlimited possibilities await you, whether it is a venturing bike ride through the majestic mountains, a scenic stroll through the tranquil trails, or skiing on the snow draped mountains.

Sheraton Steamboat

Steamboat Springs, Colorado

The Sheraton Steamboat opened in 1967 in Steamboat Springs, Colorado. The resort is located 180 miles from Denver International Airport (DIA). The resort underwent a significant renovation project in 1988. Today, the Sheraton Steamboat is a year-round resort, offering 267 rooms, suites, and condominiums.

There are a total of 45 ownership units in the Sheraton Steamboat along with 222 traditional hotel units. As with the previous examples, the ownership units are purchased by an individual and can be rented as a regular hotel room through an optional rental program.

The resort offers access to on-site and off-site amenities similar to those in the proposed Belleayre project including skiing & golf, winter and summer activities, spa & health facilities and fine dining.

Similar to the Fairmont Chateau Whistler, the Sheraton Steamboat is comparable to the Belleayre project in certain aspects, but not in others. Most notably, the Sheraton's relative age makes any analysis of secondary or environmental impacts less relevant. In addition, the population difference is fairly significant.

Promotional Information for Sheraton Steamboat

www.steamboat-sheraton.com

The Sheraton Steamboat is located just 180 miles from Denver International Airport (DIA), a pleasant 3 hour drive, in Steamboat Springs, Colorado. Opened in 1967 and renovated in 1998, the Sheraton Steamboat is a year-round resort, offering 267 rooms, suites, and condominiums

Activities at the Sheraton vary as greatly as the seasons. Winter activities include a wide variety of interests from traditional winter activities such as snow shoeing, skiing, snowboarding, to more adventurous events such as snowmobiling, ice fishing, and ice driving. The summertime offers a similar eclectic collection of activities ranging from fishing and golfing to white-water rafting and kayaking.

Regardless of the time of year, the Sheraton Steamboat also offers fine dining, world-class spa and wellness facilities and state-of-the-art conference and meeting facilities. These amenities, combined with the recreational activities, make the Sheraton Steamboat the ideal 4-season resort.

Deerhurst Resort

Huntsville, Ontario

Deerhurst Resort was opened in 1895 as a resort for Americans to enjoy the scenic Canadian wilderness. The resort is located approximately 170 miles from Toronto. Throughout its long history, the resort has undergone significant upgrades and renovations. Most recently, the owners completed a \$25 million expansion of the pavilion, the main lodge at the resort.

While Deerhurst does not offer skiing as part of the resort, there is a modest-sized skiing facility located within driving distance. However, the resort offers a large variety of winter activities including sleigh rides, snowmobiling and snowshoeing.

Summertime activities include golfing at the one of the two championship golf courses, as well as mountain biking, horseback riding and hiking.

The resort owns a wide variety of housing options, from hotel-style rooms to condominium developments. However, only 20 of the 390 rooms at the resort are available as time-shares. These units are clustered in two buildings and sold as weekly time-shares.

Deerhurst resort was constructed more than 100 years ago. Despite the consistent renovation projects over its history, there has not been a significant amount of new development to make this project a primary comparable. Although this resort could provide some relevant comparisons, the consultants feel there are other, more appropriate resorts.

Promotional Information for Deerhurst Resort

www.deerhurstresort.com

Deerhurst Resort, located approximately 170 miles from Toronto in the tourism area of Muskoka, Ontario, was opened over 100 years ago. However, since 1970, the resort has been experiencing significant expansion, making it a full four-season resort. Today, with over 100 years of continual improvements and growth, it is still the beauty of Muskoka that remains as Deerhurst Resort's most enduring asset. And the peacefulness of the sunset at the end of the lake and the call of the loon still hold the same appeal today as they did for the guests over a century ago.

Spread throughout 800 acres of idyllic countryside, Deerhurst Resort offers various rooms and suites to suit a variety of styles and needs. Guest quarters are located in low-rise buildings nestled throughout the resort landscape. All accommodation rates include complimentary access to an array of leisure activities. These activities stretch throughout the calendar year, offering plenty of activity during the winter and summer seasons.

Mount Shasta Resort

Mount Shasta, California

The Mount Shasta Resort is located roughly 220-miles from Sacramento. The resort opened in 1993. On-site, there is an 18-hole golf course, a spa & wellness center and a restaurant. Off-site, there is a wide variety of activities located on and around Mount Shasta, the Sacramento River and the Klamath River.

The resort offers individual chalets and woodland rooms. In total, there are 65 rooms at Mount Shasta Resort. The rooms hold 2-4 people, depending on size.

Mount Shasta has some characteristics that are comparable to the Belleayre project. Most notably, the amenities at the resort are similar to the scope of the Belleayre project. However, there are too many dissimilarities to include it as a primary comparable. This is mostly due to the resorts location. The resort is too secluded from a major metropolitan area and has a much smaller regional population than Belleayre. In addition, the resort has only 65 hotel rooms and no time-share/ ownership opportunities for housing.

Promotional Information for Mount Shasta Resort

www.mountshastaresort.com

The Mount Shasta Resort is located off Interstate 5, just 60 miles north of Redding and 35 minutes north of Lake Shasta. Far from the urban clutter, the resort is less driving time from the Bay Area than Lake Tahoe. The world famous Mount Shasta and Northern California's finest alpine landscapes are a backdrop to your business and recreational pursuits. Nestled in the forest near Lake Siskiyou, Mount Shasta Resort lodging allows privacy and seclusion. Experience old world charm in the grand tradition of the American Resort amidst the timeless beauty of California's unspoiled high country

Expect the finest in golfing with our professionally designed 18-hole course situated on 126 acres of dense forest and rolling terrain, offering a challenge to amateur and professional alike. Enjoy exceptional dining in our Highland House Restaurant with spectacular views of Mt. Shasta as well as quality service, California cuisine, and a truly memorable atmosphere.

However, golf isn't the only delight you'll find in the Mt. Shasta area. Mount Shasta and its immediate vicinity have many recreational activities to offer. Even the most avid golfer will feel obligated to bring more than a set of clubs.

TERTIARY COMPARABLES

The consultants looked at this group of resorts, but do not feel they provide a significant comparison to the Belleayre projects. Most notably, many of these projects were built over 20 years ago and have not had any significant reinvestment since then. The consultants do not feel these resorts would provide an analysis that is directly comparable to the proposed Belleayre project. A brief overview of each property is included from the Company's published materials, as well as the consultant's rationale for eliminating each property.

The Grand Traverse Resort

Acme, Michigan

Grand Traverse Resort and Spa is located in the northwest corner of Michigan's Lower Peninsula along the shores of Lake Michigan's East Grand Traverse Bay. Opened in 1980, Grand Traverse Resort and Spa is one of the Midwest's largest full service, year-round resort and conference destinations offering 660 luxurious accommodations, 49,000 square feet of dedicated meeting space, and 54 holes of championship golf including Jack Nicklaus's signature course (opened in 1985), Gary Player's The Wolverine (opened in 1999), and William Newcomb's Spruce Run.

Additional features of the resort include a variety of recreational offerings, including: five indoor and four outdoor tennis courts; two indoor and two outdoor swimming pools; a beach club; an upscale shopping gallery with a salon and spa; diverse restaurants and lounges; and live entertainment nightly. The Club at Grand Traverse Resort and Spa offers a limited number of memberships.

Grand Traverse was removed from the analysis due to its relative age and location. The resort opened more than 20 years ago, making many findings incompatible with the Belleayre project. In addition, the resort is located in the northwest portion of Michigan. The population within a 100-mile radius is less than 1 million. It is likely that this facility would only produce a limited amount of relevant comparative data.

Boyne Highlands

Harbor Springs, Michigan

Harbor Springs is located on the shore of Little Traverse Bay in northwest Michigan. The resort offers both winter and summer activities. Most notably, the resort offers a large ski/snowshoe facility and four golf courses, including a Robert Trent Jones golf course.

Boyne Highlands encompasses more than 3500 acres of natural and manicured settings. Numerous other activities can be found throughout the summer months such as: chairlift rides; hiking and biking trails; croquet; badminton; a unique putting course; a par 3 course; beach volleyball; 2 outdoor pools; 1 indoor/outdoor pool; numerous giant hot tubs; and tennis courts with a variety of surfaces.

There are 360 housing units at Boyne Highlands, including a 175-room hotel, 15 single-family houses and 170 condominium and townhouse-styled units. Of this total, there are only 10 time-shares. An additional 130 units are privately owned, but available for rental.

Boyne Highlands was removed from consideration due to its age and location. The resort was opened more than 40 years ago and is located in the remote northwest portion of Michigan. While there has been some residential activity at the resort in the past 3 years, the difference to the Belleayre project are too striking. There are less than 600,000 residential located within 100-miles of the resort.

Killington Resort Villages

Killington, Vermont

Located in Killington amid the scenic splendor of Vermont's Green Mountains, Killington Resort Villages offer a wide variety of winter activities including snowmobiling, cross-country skiing, snowshoeing and sleigh rides. Spring and summer also offer outdoor activities, such as hiking, mountain biking and golf. Golfers will find 270 holes of spectacular Green Mountain golf on 15 challenging courses in the area, including Killington's championship 18-hole course. Killington also offers a spa & wellness center and approximately 41,800 SF of meeting space in 17 different rooms.

Killington has approximately 750 hotel rooms and condominiums. All housing units at Killington are time-share or ownership properties. However, an estimated 550 units are available for rent, including the grand hotel property.

Killington was removed from the analysis due to its relative age. The ski resort opened roughly 50 years ago, and there has not been significant expansion/redevelopment at the resort in more than 10 years. Despite its comparable location benefits and population count, the consultants believe there is not enough new activity to generate a relevant comparison.

Mount Snow

West Dover, Vermont

Mount Snow is set in the heart of the Mount Snow Valley, first opening for skiing on December 12, 1954 with two chairlifts, two rope tows and seven trails. Over the years Mount Snow continued to grow steadily, adding lifts, facilities and snowmaking capacity. Today, Mount Snow offers four separate lodge facilities, 23 lifts capable of carrying 36,252 skiers per hour and 476 acres of snowmaking.

However, the resort has developed into a four-season facility as well. The Mount Snow Golf Course is an 18-hole championship course, and been named one of the top 10 resort courses in the country by *SKI Magazine*. The resort also offers spa facilities and meeting space.

In total, there are approximately 360 hotel and condominium units at Mount Snow. Roughly 200 of these units are 1/4 share condominiums. However, there is also a 93-room hotel and 75 fully-owned rental units.

As with the Killington, Mount Snow was removed from the analysis due to its relative age. The ski resort opened roughly 50 years ago and there has not been significant residential expansion/redevelopment within the recent past. Any findings from an analysis of this property may not be relevant to the Belleayre project.

Mirror Lake Inn

Lake Placid, New York

Mirror Lake Inn is located in the Adirondack Mountains of Upstate New York, near the Olympic village of Lake Placid. The Mirror Lake Inn is a gracious traditional Inn on the lakeshore with all the amenities of a modern resort. Guest rooms range from comfortable and homey colonial bedrooms to luxurious suites.

The Mirror Lake Inn is a four-season lakeshore resort. It offers casual, understated elegance in a wilderness setting with every imaginable activity for every season including a natural private beach, outdoor heated pool, tennis, a full-service spa and salon, a private outdoor ice skating rink, snowshoeing, and nearby golf and skiing.

The Mirror Lake Inn was removed from the analysis due to its relative age as well. The resort opened in 1926 and has remained relatively unchanged over the past 15 years. In addition, the size of the development is not comparable to the Belleayre project. In short, the Mirror Lake Inn resort does not offer a significant comparison.

Turnberry Isle Resort and Club

Aventura, Florida

Turnberry Isle Resort & Club is located in Aventura, Florida an enclave in North Miami. The resort is located 12 miles south of Fort Lauderdale International Airport and 18 miles north of Miami International Airport.

Turnberry is situated on 300-acres, with a 395-room, Mediterranean-style hotel, two Robert Trent Jones, Sr.-designed golf courses, two tennis clubs, 117-slip marina for deepsea fishing and charter yachts, and a private Ocean Club on the Atlantic with a beach, pool, cabanas and water sports. The resort also offers the Spa at Turnberry and a diverse selection of restaurants from seaside casual to the award winning Veranda restaurant.

Turnberry was removed from consideration because it is a different type of 4-season resort. It does not offer traditional, snow-related winter activities. Rather, the resort offers summertime activities year-round. In addition, the facility is located within a major metropolitan area, between Fort Lauderdale and Miami. As a result, the resort does not provide a solid basis for comparison.

Sun Valley Resort

Ketchum, Idaho

Sun Valley resort, located 152 miles from Boise, Idaho, opened in 1936. The resort was designed to be a “grand American resort”. Sun Valley’s historic Sun Valley Inn is the main lodging facility at the resort, with 510 hotel rooms and suites. The Inn was remodeled in 2002, including an all new lobby, lounge, 12,000 SF convention center and 106 additional hotel rooms.

The resort offers a total of 26,000 SF of meeting space, dining venues, a spa, and access to an 18-hole golf course.

Sun Valley was removed from the list due to its location and population disparities. The resort has been in operation for more than 60 years. While there was some expansion completed in 2002, it is not enough to compensate for the significant locational and population differences to the Belleayre project. The closest urban area to Sun Valley is Boise Idaho. In addition, there are fewer residents within 100-miles of Sun Valley than there are within 50-miles of Belleayre.

Destination Kohler

Kohler, Wisconsin

Walter Kohler first envisioned the community of Kohler more than 75 years ago. Working with the Olmsted Brothers, the designers of New York's Central Park and the Harvard University campus, he created one of the first planned communities in this country. Today, Destination Kohler offers a four-season resort experience located approximately one-hour north of Milwaukee, Wisconsin.

The resort offers residents and guests a health & sports facility, a hunt club, a nature preserve, four Pete Dye-designed championship golf courses, a luxurious full service spa, a shopping center and restaurants. The two Blackwolf Run and two Whistling Straits golf courses have been critically acclaimed since their openings in 1985 and 1998, respectively.

The Kohler resort does not offer the most ideal comparison to the Belleayre project. Most notably, the town is a planned development location that has as many year-round residences as vacation housing. Also, there are no skiing venues within a reasonable drive from the resort. While some residential development has occurred over the past 10 years, the community still has a predominant full-time population. The Kohler factory is also located within close proximity to the resort. This facility makes comparisons difficult with Belleayre.

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Project Technical Memorandum

To: NYCDEP – OEPA
Subject: Crossroads DEIS Review – Deliverable A.3.1 – Supplemental Data for
Evaluation of Comparable Facilities to the Proposed Belleayre Resort
Date: October 20, 2003 (Finalized February 2004)

RKG gathered additional information regarding spin-off effects, water quality impacts and induced growth associated with some of the comparable developments we reviewed as part of Task A.3. Despite extensive research related to resort development, no recent resort developments proved to be an exact match to the proposed Belleayre Resort. As a result, RKG conducted additional telephone and internet research to gain a better understanding of those properties considered to be most comparable to the proposed Belleayre Resort, to assist NYCDEP in selecting properties to review as indicative of the potential impacts of the proposed resort.

Additional Information Gathered

RKG attempted to gather additional information on the nine resorts which were considered to be most comparable to the proposed Belleayre Resort. RKG contacted community planners and other local officials, as well as those familiar with the projects, to gather information regarding environmental and economic impacts associated with the resorts. Where published data was available, a copy was requested, which will be provided to NYCDEP when it is received.

Discussions with community representatives in both Whistler, British Columbia and Steamboat, Colorado indicated that although the new development projects were significant, they were just a small part of the previously developed resorts in both areas. As such, it would be difficult to evaluate whether the projects resulted in induced economic growth, or whether they are the induced growth associated with earlier development projects in the region. For this reason, the Steamboat and Whistler projects are not recommended for additional study. Despite RKG's attempts, no additional information could be obtained regarding the Collingwood, Ontario project.

Additional information was gathered on five of the comparable resort developments identified in the Resort Matrix, included in Technical Memorandum A.3 (see Appendix A.5, Evaluation of Comparable Facilities to the Proposed Belleayre Resort). The five resorts include:

- Snowshoe Mountain, West Virginia;
- Mountain Creek, New Jersey;
- Keystone, Colorado;
- Northstar-at-Tahoe; and
- Old Greenwood, California.

Discussions with local officials indicate that Mountain Creek and Snowshoe have experienced some level of secondary economic growth related to the resorts. Both Mountain Creek and Snowshoe have seen proposals for gas station/convenience stores along the primary highway leading to the resort. At Mountain Creek, traffic volumes were such that a loop road around the primary access to the resort (and related intersections) was necessitated. Also, some pre-existing approved developments have been accelerated, while others have sought to reposition themselves to capitalize on the number of potential customers being attracted to the area. For example, one 674-unit residential project was reduced by 40% in favor of adding a 9-hole golf course.

At Snowshoe, about 11,000 acres are controlled by the development company, and there is no zoning. Essentially, the owner negotiates allowable uses at the time of each sale, and creates a written agreement as part of the sale documentation in the form of a covenant to the deed. Off-site, a gas station/convenience store of 5,000 square feet and a small 7,000 square foot multi-tenant retail center (strip mall) have been developed. On-site, one 7-acre parcel is being developed for retail uses (5,000 square feet). Another 40-acre parcel is expected to be developed with 60 to 70 houses in the \$350,000 to \$400,000 range, 20,000 square feet of commercial uses and a 100-room hotel. Interestingly, land was reportedly selling for around \$10,000/acre prior to Intrawest's investment at Snowshoe, but the 7-acre site sold for a reported \$1 million.

During the course of seeking additional information on Keystone, RKG learned that Copper Mountain, which is located approximately 10 miles from Keystone, is completing an 18-month process to double their allowable uses under their Planned Unit Development (PUD) permit. The current expansion will add a reported 1,244 housing unit equivalents, as well as 50,000 square feet of food service, conference facilities and additional retail space. The Northwest Colorado Council of Governments (NWCCG) installed water quality monitoring equipment around Copper Mountain during the construction of a recent expansion. The NWCCG agreed to share the data and findings from that analysis.

The Lahontan Regional Water Quality Board monitors water quality in Placer County, CA. According to County officials, the water quality board has monitoring devices located along tributaries and rivers near the Northstar-at-Tahoe development. RKG Associates is attempting to acquire data from the Board about the impacts of the recent construction at Northstar.

See Appendix A.7, Environmental Impacts Associated with Facilities Considered Most Comparable, for additional information on impacts associated with comparable resort developments.

Recommendations

RKG recommends using the case studies of Snowshoe Mountain in Snowshoe, West Virginia and Mountain Creek Resort in Vernon, New Jersey to evaluate the potential economic development associated with the Crossroads development. These two resort developments provide the most appropriate economic comparison to the Crossroads proposal for three reasons.

First, the Snowshoe Mountain and Mountain Creek Resort developments are large economic development projects, as compared to the size of their respective communities. Therefore, these two projects are considered likely to have a larger impact on the local economy than the other case studies presented in the resort matrix.

Second, Snowshoe, West Virginia and Vernon, New Jersey are relatively isolated from other significant resort development, compared to the other case studies. Snowshoe Mountain is the only resort in Pocahontas County. Mountain Creek Resort is the first significant development near the ski lifts in Vernon. It is more likely that any additional economic development activity occurring in and around Snowshoe Mountain and Mountain Creek Resort will be directly attributable to these developments.

Last, conversations with local public officials in Snowshoe, West Virginia and Vernon, New Jersey confirm that Snowshoe Mountain and Mountain Creek Resort have experienced follow-on economic activity which appears to be related to the resort development. It could be valuable to understand, through more extensive analysis, how this activity is related to the development of the resort, and whether this could be relevant to the proposed Belleayre Resort.

In terms of environmental impact analyses, specifically water quality impacts, RKG recommends using the case studies of Keystone/Copper Mountain in Summit County, Colorado and Northstar-at-Tahoe (Northstar Village) in Placer County, California. RKG recommends these

two case studies because water quality impacts from these resorts have been formally studied in each respective County.

RKG also considered the Roaring Fork Club resort in Basalt, Colorado as a case study for its environmental impacts. According to Town officials, the Roaring Fork Conservancy regularly collects water quality impact data from the use of chemicals on the golf course at the Roaring Fork Club. Since the Roaring Fork Club has a significant fly-fishing area adjacent to the golf course, this data would provide an unique look at the potential impacts on the fish habitats around the Crossroads development. However, since the resort is very small in terms of the number of residential and lodging units, and since water quality data could not be obtained, this project was not evaluated further.