

**A. INTRODUCTION**

The New York Racing Association (NYRA) (the Applicant) has prepared a Redevelopment Plan (hereafter referred to as the “Proposed Project”) for the historic Saratoga Race Course (the Project Site) in Saratoga Springs, New York (see **Figure S-1 to S-3**). The Proposed Project includes both specific planned elements that have established design criteria and several conceptual or more generic improvements that will be further refined or scheduled for implementation in the future. Implementation of Proposed Project components will be phased over an approximately 9-year horizon depending on need, schedule, and funding with an anticipated final build year of 2024. These consist of proposed new buildings, renovations to existing structures and facilities, and demolition of existing structures, which are described in detail in the Project Description section below.

In accordance with the State Environmental Quality Review Act (SEQRA), this Draft Generic Environmental Impact Statement (DGEIS) has been prepared to provide a comprehensive assessment of the potential environmental impacts associated with the implementation of the Proposed Project in all phases of construction and operation. The content of the DGEIS is consistent with the Scoping Document approved by the Franchise Oversight Board (FOB) on September 16, 2013. Consistent with SEQRA requirements, the DGEIS also sets the analysis parameters from which impact thresholds for future actions carried out under the Proposed Project can be measured against and when changes to the Proposed Project could require supplemental environmental assessment. Table S-1 summarizes the DGEIS impact thresholds.

**Table S-1  
DGEIS Impact Thresholds**

<b>Chapter</b>	<b>Impact Threshold – if exceeded could require additional environmental assessment</b>
Chapter 1: Project Description	Integration of additional project elements not identified in this DGEIS.
Chapter 2: Land Use, Community Character, Zoning and Public Policy	Redevelopment of the site not in accordance with the bulk, massing, and location of project elements as described in this DGEIS.
Chapter 3: Community Services	No threshold impact sensitivity. Independent of the Proposed Project, coordination between NYRA and service providers (i.e., police, fire, EMS, schools, solid waste management, recreation) are ongoing and needs are evaluated regularly.
Chapter 4: Geology, Soils and Topography	Excavation that exceeds the depth to bedrock or results in disturbance to artesian springs. Footprint of disturbance that exceeds that estimated in the GEIS.
Chapter 5: Natural Resources	Redevelopment of the site cannot result in tree removal during summer-roosting of Northern Long-Eared Bats unless allowed by USFWS and NYSDEC.

**Table S-1 (cont'd)  
DGEIS Impact Thresholds**

<b>Chapter</b>	<b>Impact Threshold – if exceeded could require additional environmental assessment</b>
Chapter 6: Surface Waters and Wetlands	A change to the Proposed Project that would result in direct or indirect impacts to onsite wetlands or waters.
Chapter 7: Stormwater Management	An increase in post-construction runoff rates after implementation of stormwater management practices for all areas of new development and redevelopment.
Chapter 8: Water Supply	A change to the Proposed Project that increases water demand beyond the 53,240 gpd project-generated increase cited in the DGEIS (unless allowed by City of Saratoga Springs) or requires installation of new infrastructure in addition to improvement identified in the DGEIS.
Chapter 9: Sanitary Sewer Service	A change to the Proposed Project that increases sewer demand or treatment capacity beyond the 53,240 gpd project-generated increase cited in the DGEIS (unless allowed by City of Saratoga Springs and/or Saratoga County) or requires installation of new infrastructure in addition to improvements identified in the DGEIS.
Chapter 10: Energy and Telecommunications	A change to the Proposed Project that would increase energy or telecommunication demands and result in the need for new infrastructure requiring construction or ground disturbance.
Chapter 11: Traffic	A change to the Proposed Project that would increase traffic generation above what was analyzed in the DGEIS by 20 percent as this could result in additional impacts at the study intersections (based on traffic impact study sensitivity analysis).
Chapter 12: Air Quality	If additional traffic assessment is required, an air quality screening assessment may also be required.
Chapter 13: Noise	If additional traffic assessment is required, a noise screening assessment may also be required.
Chapter 14: Economic Conditions	No threshold impact sensitivity.
Chapter 15: Cultural Resources	A change to the Proposed Project that would require modification to the Letter of Resolution (LOR).
Chapter 16: Visual Resources	A change to the Proposed Project that would require modification to the Letter of Resolution (LOR).
Chapter 17: Hazardous Materials	No threshold impact sensitivity.
Chapter 18: Construction	More than the threshold set by the Applicant in Chapter 18 of the DGEIS of two large construction elements (requiring more than 18 months for construction) occurring at the same stage of the construction process.

## **B. SITE HISTORY AND BACKGROUND**

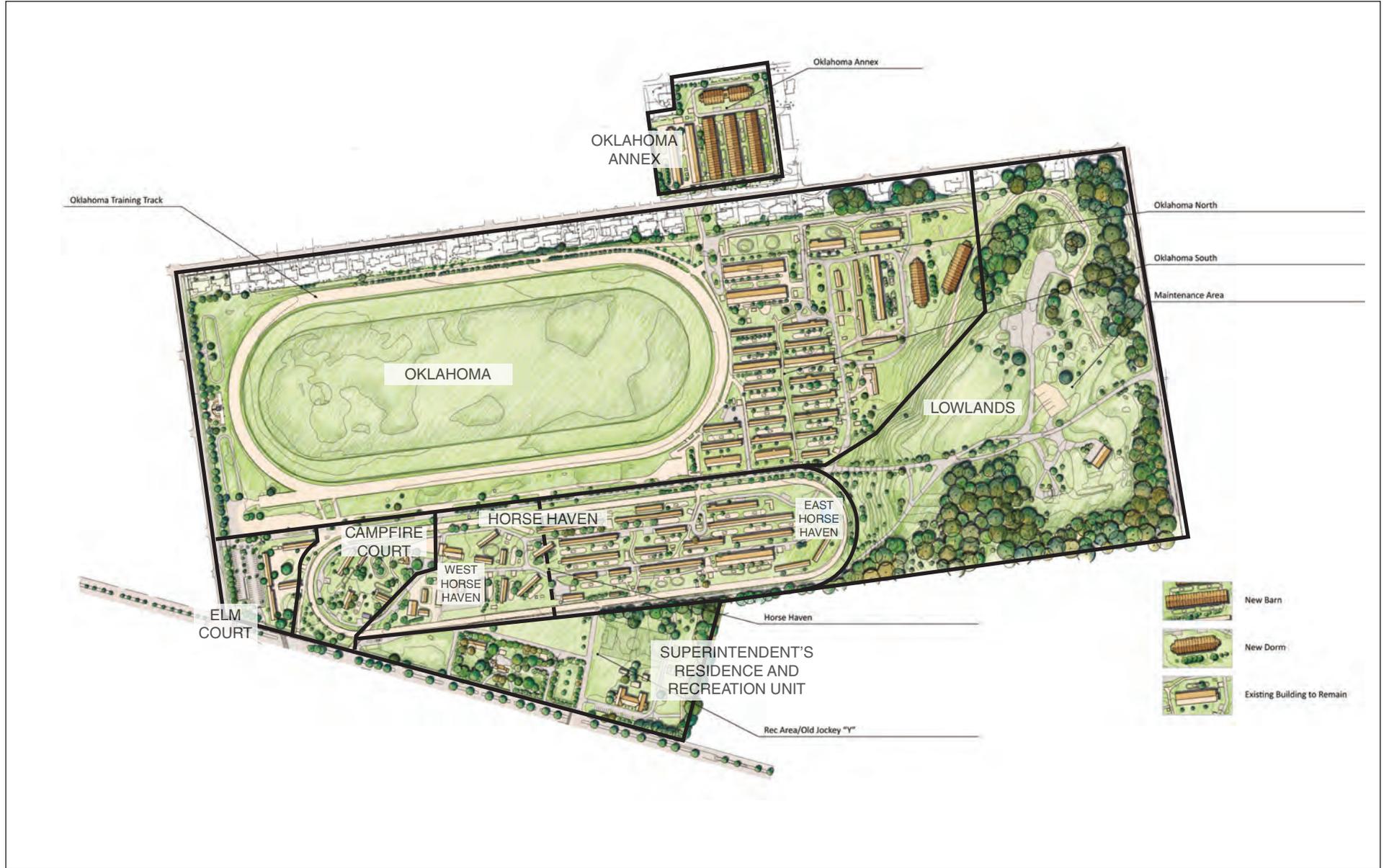
The Project Site is the Saratoga Race Course, located in Saratoga County, New York, within the City of Saratoga Springs.

Gideon Putnam first established the hotel and spa that would become Saratoga Springs in 1802. The mineral springs around which the resort centered quickly became famous for their purported curative properties and within decades were the center of one of the nation's most popular and lively resorts. Organized horse racing began in the 1840s with the establishment of the Saratoga Trotting Course (now the location of Horse Haven within the present Race Course). The early



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For Illustrative Purposes Only



SOURCE: Phinney Design Group

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Race Course was famously expanded and re-envisioned by John Morrissey. Morrissey enlarged the course and improved the facilities, adding a mile-long track and a grandstand. These improvements, coupled with well-promoted high-caliber events firmly established the Race Course as the most fashionable and well-regarded racing facility in the country.

The present Grandstand, designed by Herbert Langford Warren, was erected in 1891 and new attention was given to landscape design and course layout. In 1901, William Collins Whitney assumed leadership of the Race Course and invested in the grounds, almost doubling the acreage of the facility, creating the Oklahoma Track, and hiring landscape engineer Charles Leavitt to integrate the design of the landscape and buildings of what are now known as the Frontside and Backstretch. During the Great Depression, another transformation occurred, as the anti-gambling lobby gave way to increasing legalization of betting, including pari-mutuel wagering on horses. After a brief closure during World War II, the Race Course received new attention following the 1950s founding of NYRA. The firm of Arthur Froehlich and Associates, a preeminent designer of racetracks, was hired to plan expansions, such as the expansion of the Grandstand, which occurred in 1965. Other changes made in the 1970s and 1980s altered the earlier landscape design and introduced new structures.

In 2008, NYRA prepared the 2008 Capital Projects Strategy which was a state-wide strategic review of NYRA facilities to determine which facilities would ensure a sustainable future for New York Racing. The 2008 Study concluded that NYRA's core racing product was the best in the country despite periods of difficulty in recent history. To maintain NYRA's competitive standing, the study concluded that many of the existing historic Saratoga Race Course facilities and amenities needed to be rehabilitated and modernized to revitalize patron facilities.

NYRA began to communicate with the Saratoga community its intention to respect the history of the Race Course in considering redevelopment plans. Historic resource inventories of the Race Course were commissioned from the Saratoga Springs Preservation Foundation, Inc. and NYRA developed a conceptual plan for the Frontside and Backstretch, which was informed by the historic resources inventory and which sought to increase revenue at the Saratoga Race Course in a sustainable manner. The plan identified a series of potential projects at Saratoga that could be implemented when funding became available. Lastly, NYRA communicated these developments to the public through the release of the Capital Projects Strategy Potential Projects presentation during the Saratoga Race Season in 2011.

In 2012, NYRA built upon the conceptual studies started in 2011 and undertook more detailed studies regarding potential improvement projects at Saratoga. Baseline surveys of the existing buildings and other infrastructure at the Race Course were developed and master plans for the Frontside and Backstretch were prepared. The environmental review process, of which this GEIS is a part, was also initiated at this time.

### **C. PURPOSE AND NEED**

Saratoga Race Course is the oldest Race Course still in existence in the United States and is the oldest sports facility in the country. No comprehensive review of the site's historic facilities had occurred until the recent historic resource inventories were completed. The Race Course includes numerous buildings of various ages and is part of the State and National Register of Historic Places (S/NR) Union Avenue Historic District. Many of the buildings on the Project Site are contributing historic resources to the historic district and need to be rehabilitated and modernized. (These buildings are described within as 'historic' buildings or elements throughout

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the document.) The goal of the Proposed Project is to retain and lengthen the stay of existing patrons, sustain and attract visitors into the future, and provide a broader spectrum of service choices and offerings for guests that can increase overall revenues from Race Course operations while preserving the historic landscape and character of the Saratoga Race Course. In addition, a portion of the proposed improvements are focused on enhancing operational efficiencies that benefit the racing participants such as upgrades to the stables and dormitories. The Proposed Project is not expected to lengthen the racing season and peak attendance and overall attendance volumes are not expected to increase substantially. The Proposed Project would not be expected to result in substantial changes to the existing non-seasonal use of the facility.

### **PURPOSE OF THE GEIS**

The Proposed Project includes both specific planned elements that have established design criteria (primarily for the Frontside area) and several conceptual or more generic improvements (i.e., the addition of new barns or dormitories as well as the conversion of existing barns or dormitories in the Backstretch) that will be further refined or scheduled for implementation into the future. In accordance with SEQRA, this GEIS is intended to assess the environmental impacts of the Proposed Project and will evaluate both the specific planned elements as well as the conceptual or generic future improvements. The GEIS will also set the analysis parameters from which impact thresholds for future actions carried out under the Proposed Project can be measured against. In addition, the GEIS will identify and disclose typical and ongoing reinvestment in the Race Course that would not be subject to environmental review, such as refurbishment of existing non-historic barns and dorms, routine fence maintenance, and the installation and removal of temporary structures. In this manner, the GEIS will allow for an environmental assessment of the cumulative effects of the overall Proposed Project.

## **D. PROJECT DESCRIPTION**

### **PROJECT SITE**

The Project Site is the Saratoga Race Course. It contains approximately 337 acres of previously disturbed areas, including the Main race course, lawn and other vegetated and unvegetated open space and dirt paths, 74 acres of unvegetated surfaces, 47 acres of roads, buildings, and other paved surfaces, 17 acres of forested area, 4 acres of regulated wetland, and 3 acres of water surface. The Project Site is divided into two primary areas: the Frontside and Backstretch.

#### *FRONTSIDE*

The Frontside is the public face of the Saratoga Race Course. It is where spectators watch and bet on the races and all guest services including the concessions, picnic areas, and the Grandstand/Clubhouse are located. The Frontside portion of the Saratoga Race Course is 109 acres and is located entirely south of Union Avenue. The Frontside includes the following buildings and elements: Grandstand/Clubhouse Complex, the Main Race Course, the Paddock, the Saddling Shed, Clark's Cottage, the Stakes Barn, the Backyard, as well as restrooms, picnic areas, concession areas, and mutuels.

#### *BACKSTRETCH*

The Backstretch contains the Race Course's support facilities such as a garage and carpenter's shop as well as stables for the horses and dormitories for the grooms. The Backstretch also

contains the Oklahoma Training Track, a recreation area for the grooms, and the track maintenance area. The Backstretch currently contains the Oklahoma Training Track, 90 barns with 1,820 stalls, 90 bunkhouses with 1,820 rooms, as well as buildings for recreation, restroom facilities, kitchens and administration services. The Backstretch is 228 acres and is located on both sides of Union Avenue.

## **PROPOSED PROJECT**

The Proposed Project consists of three (3) categories of elements, which differ in the level of building details and plans that have been developed for each. “Specific Planned Elements”, such as the proposed Nelson Avenue Service Building discussed below, are primarily limited to the publicly accessible Frontside portion of the Project Site and have been developed with concept plans and specific design criteria as presented in this DGEIS. These elements include the relocation of barns and dorms, primarily located within the Backstretch portion of the Project Site. These improvements are expected to be implemented over the next nine years. Conceptual renderings of these projects have been developed (as shown in **Figures S-1 to S-3**, above), but no final plans or design criteria have been prepared. Lastly, “Background Projects” include ongoing capital investment in the current facilities (Frontside and Backstretch) and are expected to occur with or without implementation of the Proposed Project. These projects include the refurbishment of existing barns and dorms, which are not considered historic resources, routine fence maintenance, and the installation and removal of temporary structures (i.e., sponsorship tents) during the racing season. Background Projects are considered to have no potential to adversely affect historic resources. Background Projects are considered Type II actions under SEQRA and are not specifically analyzed in this GEIS, but have been identified to allow for a cumulative assessment of changes occurring on the project site.

Because the project involves ongoing design and refinement of selected improvements specific to contributing historic resources, a Draft Letter of Resolution (LOR) between NYRA, FOB, OGS, and Office of Parks Recreation and Historic Preservation (OPRHP) has been prepared to provide guidance and would provide guidance on physical alterations to contributing buildings, physical alterations to character-defining landscape features, and new construction and exterior alterations to non-contributing buildings (see page S-18 for additional details).

### *FRONTSIDE*

The Proposed Project for the Frontside includes construction of new buildings, new grandstand seating and luxury boxes, parking areas, pedestrian facilities including walkways and pavilions, horse paths, and planted areas, as well as the renovation of existing buildings and facilities, including upgrades to utilities, and the removal of certain structures.

The proposed Frontside projects are described below for each area. Implementation of the Frontside projects is expected to create approximately 96,000 square feet of new building area, 457,000 square feet of renovations, 12,100 square feet of reprogrammed facilities (i.e., food service and retail) within existing building footprints, and approximately 200 new seats for patrons in specific areas of the grandstand.

#### *Nelson Avenue Service Building*

The Nelson Avenue Service Building is a proposed new building, which will house the site’s central receiving, administrative offices, and a new production kitchen. The new building will provide more space and upgraded facilities and centralize many operational functions to improve

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efficiency by removing these uses from the immediate vicinity of the Race Course. The new building and associated site development would be constructed on an existing parking area located at the corner of Nelson Avenue and Wright Street. The proposed building would be two stories encompassing a total of 32,655 sf. In addition, the Nelson Avenue Service Building would provide a loading area that would replace some of the existing loading docks currently located on the lower level of the Grandstand. This would free space in the Grandstand for additional guest services.

### *Wright Street Gatehouse Modifications*

The proposed Wright Street Gatehouse Modifications would revitalize the appearance and operational efficiency of the existing Wright Street Gate Entrance by adding a new pedestrian plaza and creating more space between the gate and the horse path. This additional space would improve the safety of the horses, as well as the guests viewing the horses, by moving the gate out toward Nelson Avenue away from the horse path.

### *At the Rail Building*

The At the Rail Building is a new building proposed to be located immediately south of the Wright Street Entrance and between the proposed new Nelson Avenue Service Building and the west side of the historic Clubhouse. The proposed 34,000 sf three-story building would provide a variety of high-end hospitality venues including banquet areas, outdoor dining terraces, restaurant and party suites with balconies overlooking the Race Course. The building would provide a level of service and higher-end amenities currently not available at the Race Course and increased sponsorship potential. This building would replace the temporary tents and trailers that are currently erected and dismantled every season.

### *Clubhouse Modifications*

The Historic Clubhouse modifications are proposed to improve the overall patron environment and to raise the level of service by providing a higher-end entertainment experience. The service and hospitality spaces within the Clubhouse would be reprogrammed and existing dining and box seats service would be improved through renovations to the kitchen spaces on all levels. The additional kitchen space proposed in the new Nelson Avenue Service Building will allow the existing kitchen spaces in the Clubhouse to be reduced in size. The newly available space will be repurposed to allow for more guest area. Further, the space would be renovated to create new opportunities for sponsorship venues, air conditioned areas, and concessions.

### *Pressbox/Judge's Tower*

The Press Box and Press Standing Area would be relocated from their current setting, which is currently accessible only by catwalk within the Grandstand roofline. The new Press Box would be constructed at the center of the clubhouse directly accessible from the main 4th floor level and is proposed to be 2,000 sf. This relocation would provide greater accessibility to the Press Box and would allow the Press to step outside the box to view races.

### *Grandstand/Carousel Modifications*

The Grandstand/Carousel Modifications would result in improvements to the most visible and recognized element of the Race Course. The historic Grandstand structure provides an element of grandeur to the site and houses the majority of visitors to the Race Course. The proposed modifications would result in the reprogramming of space on all three levels of the Grandstand to maximize efficiency and would include increases to kitchen and restroom space, renovation to

the lower level including the provision of new escalators to facilitate the flow of people between levels, relocation of administrative offices to the East End of the building, new concession area for casual dining, redesign of the mutuels area to accommodate the constantly evolving technology with respect to betting and the shifting trend to digital and mobile-based betting systems, and reconfiguration of Grandstand seating to add 206 additional seats.

*Top of the Stretch Club*

The Top of the Stretch Club would be created from a redesign of the service area at the east end of the Grandstand combined with the construction of a new 3,000 sf addition adjacent to the East End. Approximately 3,000 sf of the Grandstand would be reprogrammed to include a new kitchen and restrooms, a 2,500 sf conditioned hospitality venue, a new 3,000 sf open air patio, and a variety of new seating choices. The Top of the Stretch Club would be designed to attract a younger crowd to the Race Course by providing a more casual atmosphere than the traditional Grandstand.

*Apron Modifications*

The Race Course Apron is the paved area outside the Grandstand adjacent to the Main Track where guests can view each race. The current apron layout does not provide enough space for guests to stand on the apron and watch the races without being visually obstructed. The proposed apron modifications would improve views of the Race Course by increasing the slope of the apron to improve visibility for both standing and seated guests.

*Paddock Modifications*

Modifications to the Paddock are proposed to increase guest viewing of the jockeys and horses before the races. Incorporated within the overall Paddock modifications would be the new Jockey House and the Saddling Shed Modifications.

*Saddling Shed Modifications*

The Saddling Shed is one of the most historically significant structures at the Race Course. The proposed Saddling Shed modifications would remove non-historic elements and spaces that were added over the years and uncover the historic characteristics of the original structure, restoring the Saddling Shed into an open-air pavilion and allowing for clear views across the Paddock. A walk-up champagne bar with 100-120 seats centered under the Saddling Shed structure would be constructed. The existing mutuels at this location would be replaced with two low-profile mutuels bays on either side of the champagne bar to recreate an open-air venue.

*New Jockey House*

The New Jockey House would be constructed within the Paddock and Saddling Area adjacent to the Paddock. The New Jockey House is part of the proposed enhancements, which would provide upgraded amenities, space for racing offices and a streamlined procession for horsemen, trainers, and jockeys to the Race Course. The total square footage of the new Jockey House is proposed to be 14,356 sf, which includes 16 horse stalls, male and female jockey facilities, common areas, support and NYRA racing offices.

*Existing Jockey House/Administration Building*

The existing Jockey House and Administration buildings are a cluster of three historic buildings located within the Paddock and Saddling Area. As part of this project element, the existing

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jockey facilities would be moved to the new Jockey House and the existing historic building would be reprogrammed to house administrative offices, reserved guest seating, guest services offices and a new NYRA retail store and café.

### *Lincoln Avenue Entrance*

The proposed new Lincoln Avenue Entrance would create a major access point along Lincoln Avenue. The Lincoln Avenue Entrance would be located within the Paddock and Saddling Area and its central location would make the entry an easy pedestrian access point from all areas of the Frontside creating a safer and more accessible entrance to the Race Course. The Lincoln Avenue Entrance would feature a roundabout at the eastern terminus of Lincoln Avenue within the Park, which would serve as a guest drop off as well as create a safer and more streamlined vehicular access to the parking area and Frontside. In addition, the new Lincoln Avenue entrance incorporates a paved space in front of the proposed new gatehouse to allow guests to gather while waiting in line to buy tickets. The Lincoln Avenue Entrance would replace the existing Union Avenue Entrance, which is proposed to be converted to the Grandstand Garden.

### *Backyard Expansion*

The Backyard of the Saratoga Race Course includes the entire Union Avenue Entrance and Backyard Area, as well as portions of the Auto Park Area and the Paddock and Saddling Area. The modifications to the Backyard would include a number of renovation and landscape projects including improved seating areas, enhanced food offerings, better organized retail spaces, as well as more organized mutuels and video/TV areas.

### *East Avenue Entrance*

The East Avenue Entrance is centrally located along Union Avenue, the main roadway accessing the site. Improvements to the existing entrance would provide new landscaping, pedestrian pathways and a new semi-circular drive in front of the gate with the objective of creating an easier and safer guest drop-off and pick-up area by providing a buffer between the gatehouse and Union Avenue. The redesigned entrance would also include improved handicapped drop-off.

### *Grandstand Garden*

The Grandstand Garden would be located within the Union Avenue Entrance and Backyard Area and would repurpose a part of the Race Course that is currently underutilized. Under the Proposed Project, a portion of the lawn where guests currently picnic will be developed into a beer garden with large tables and improved food service.

### *Picnic Area*

The Picnic Area encompasses portions of the Union Avenue Entrance and Backyard Area as well as the Paddock and Saddling Area. Improvements to the Picnic Area include landscaping, the addition of picnic areas, redefinition of pathways, replacement of TV umbrellas with larger flat screen TVs, and the addition of sponsorship kiosks throughout the Backyard.

### *Clark's Cottage*

Clark's Cottage is an existing historic building located within the Clark's Cottage Area. As part of the Proposed Project, the existing community relations and human resources uses of the Cottage would be moved to the new Nelson Avenue Service Building. Clark's Cottage would be restored and renovated to be used for Horsemen's activities, containing a Horsemen's Lounge

including mutuels, concession and restrooms. The second floor would include Veterinary and Horsemen's staff as well as restrooms and storage Vet and Horsemen's ID.

#### *Superintendent's Residence*

The Superintendent's Residence is part of the Frontside Proposed Project, but it is technically located within the Backstretch, south of Horse Haven on Union Avenue. This location includes an existing Colonial Revival-style residence and two garages. As part of the Proposed Project, the house is proposed to be renovated to accommodate small corporate parties visiting the Race Course.

#### *BACKSTRETCH*

The Backstretch encompasses all of the non-public areas of the Race Course on either side of Union Avenue. The Proposed Project divides the Backstretch into the Backstretch North and Backstretch South. The Proposed Project includes the removal and replacement of a number of barns and dormitories, as well as the refurbishment and reuse of existing barns and dormitories and other buildings. In total, four new barns including one holding barn (used to house the horses that come to race for the day and are not stabled overnight on the site) and 6 new dormitories are proposed. The barns would provide 40 new stalls and the dormitories would provide 32 new rooms (two residents per room) for a total of 384 new residents. The new dormitories would modernize the current facilities to improve living conditions. The projects proposed for the Backstretch are described by area below.

The Proposed Project provides for a long-term initiative to upgrade, restore, and replace the critical facilities necessary to provide for workers and horses, which underpin the Race Course operations. The Plan represents a full complement of potential changes for the Backstretch although it is noted that based on need and funding availability, program elements may be eliminated or reduced in scale and scope.

#### *Backstretch North*

##### *Oklahoma*

Oklahoma encompasses the Oklahoma Training Track and the area immediately east of it. There are 47 buildings within Oklahoma including, 21 barns, 19 bunkhouses, and seven buildings that serve other functions such as restrooms and offices.

As part of the Proposed Project, two new dormitories are proposed within the Oklahoma Area. No existing buildings would be demolished or relocated. Eight bunkhouses would be refurbished, as would two office buildings and one shed. The following additional improvements are also proposed:

- Remove/reroute portions of the existing vehicular circulation to provide consistent perimeter vehicular circulation;
- Restore central portions from dirt to turf and reserve for horse circulation only;
- Provide walking rings and central turf area at each barn;
- Provide central wash pads at new barns.

##### *Oklahoma Annex*

The Oklahoma Annex is the northernmost area of the Race Course and is located across Fifth Avenue from the Oklahoma Training Track. The Oklahoma Annex currently contains two barns

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with 93 stalls, a Pony Barn/walking shed, a 12-room dormitory, a 2-room bunkhouse, a trainer's office, and a toilet building. The following improvements are proposed as part of the project:

- Demolish existing 12-room dormitory, toilet building, and Pony Barn/walking shed;
- Refurbish one bunkhouse and the trainer's office as a trainer/tack room;
- Construct three new barns and two new dormitories.

### *The Lowlands*

The Lowlands Area is the easternmost portion of the Backstretch. It is currently used as a maintenance area for the Race Course and contains soil and sand stockpiles for track maintenance, dumpsters, and stormwater infrastructure. No structures are proposed to be constructed within the Lowlands Area as part of the Proposed Project. The Lowlands area would continue to be used for soil and sand stockpiles for track maintenance, dumpsters, and stormwater infrastructure. In the future with the Proposed Project, an area in the central/western portion of the Lowlands would continue to be used for seasonal overflow parking and may have expanded use to accommodate displaced parking associated with the "Backyard Expansion" as part of the proposed Redevelopment Plan. Like the current parking, no improvements or grading would be required to accommodate the expanded parking utilization.

### *Horse Haven*

The Horse Haven Area is located across Union Avenue from the Main Track immediately south of the Oklahoma Training Track. It is the oldest and most historic area of the Race Course and as such, the proposed improvements have been designed to avoid adverse effects on the historic character of the area. Horse Haven houses the Race Course maintenance buildings including a garage, green house, carpentry shop, paint shop, blacksmith shop, plumbing shop, and a security office as well as numerous barns and dormitories. Horse Haven is comprised of four smaller Areas: East Horse Haven, West Horse Haven, Elm Court, and Campfire Court.

#### *East Horse Haven*

The East Horse Haven Area currently contains 30 buildings, including 14 barns, 12 bunkhouses, and four other buildings (three restrooms and a kitchen). As part of the Proposed Project, no new buildings would be constructed and no existing buildings would be demolished within East Horse Haven. As part of the ongoing and future background projects undertaken by NYRA, seven bunkhouses and the one freestanding restroom would be refurbished as trainer/tack rooms.

#### *West Horse Haven*

West Horse Haven currently contains 19 buildings, including eight barns, two bunkhouses, seven maintenance buildings, one restroom building, and a garage. As part of the Proposed Project, no new buildings would be constructed and no existing buildings would be demolished within West Horse Haven. One bunkhouse would be refurbished as a trainer/tack room and two maintenance buildings would be refurbished as part of the ongoing and future background projects undertaken by NYRA.

#### *Elm Court*

Within Elm Court there are four barns and one bunkhouse. No structures are proposed to be constructed, demolished, or altered within Elm Court as part of the Proposed Project.

#### *Campfire Court*

The Campfire Court Area contains four barns, one bunkhouse, one restroom building, one security office, one facilities management office, two maintenance buildings and a former icehouse currently used as storage. As part of the Proposed Project, no new buildings are

proposed to be constructed and no existing buildings would be demolished. The Security Office and Facilities Management Office would be refurbished as part of the ongoing and future background projects undertaken by NYRA.

#### *Backstretch South*

South of Union Avenue, the Backstretch is composed of five distinct areas: Dupont, Madden Court, the Backyard, Clare Court, and Sanford.

##### *Dupont*

DuPont is located immediately east of the Main Race Course. For the purposes of this document, DuPont is defined as the roughly 11-acre area that encompasses two subareas. The first is a smaller 1.15-acre subarea bordering Yaddo to the east and Union Avenue to the north, which was part of the estate of the DuPont family in the early 20<sup>th</sup> century. The larger (9.9-acre) subarea that forms the bulk of the larger Dupont area is sometimes known as Millionaire's Row, presumably a reference to the wealthy individuals who utilized these stables in the early 20<sup>th</sup> century. The entire 11-acre area contains 11 barns, 16 bunkhouses, two storage sheds, two freestanding restroom facilities, and a tack room. As part of the Proposed Project, one new barn and one new dormitory would be constructed. No existing buildings would be demolished or relocated. Eight bunkhouses, the two storage sheds, the two restroom buildings and the tack room would be refurbished as part of the ongoing and future background projects undertaken by NYRA.

##### *Madden Court*

The Madden Court Area is located to the south of Dupont and directly south of the Race Course. It contains seven barns, ten bunkhouses, and three free-standing restroom facilities. As part of the Proposed Project, two new dormitories would be constructed within the Madden Court Area, two bunkhouses would be demolished, and one bunkhouse and one free-standing restroom would be refurbished as part of ongoing and future background projects.

##### *Clare Court*

The Clare Court Area is located south of Union Avenue and just east of Nelson Avenue. It currently contains four barns, four bunkhouses, the former historic Belmont Summer House and the Clare Court Tunnel. The tunnel allows access to the interior of Clare Court beneath the oval exercise track that runs along the perimeter of the Area. The path that passes through the tunnel leads from Gate 10 at the northwest corner of Clare Court near Nelson Avenue to the interior of the Clare Court Area. As part of ongoing and future background projects, the historic former Belmont Summer House would be refurbished and used as a female dormitory or married couple housing, and the four bunkhouses would be refurbished and used as trainer/tack rooms.

##### *Sanford*

Sanford is located south of Union Avenue and on the west side of Nelson Avenue. Sanford Court currently contains two barns and three bunkhouses. As part of the Proposed Project, no existing buildings would be demolished and no new buildings would be constructed. One bunkhouse would be refurbished as part of ongoing and future background projects.

##### *Backstretch*

There is a portion of the overall Backstretch that is referred to as the Backstretch Area. The Backstretch Area is located south of the Main Race Course and west of Madden Court. It contains 13 barns, 20 bunkhouses, two free-standing restroom buildings, a trainer's office, and two kitchens. As part of the Proposed Project, one new barn would be constructed, and no

existing buildings would be demolished. Thirteen bunkhouses and two restroom buildings would be refurbished as part of ongoing and future background projects.

## **E. PERMITS AND APPROVALS**

To implement the Proposed Project, it is anticipated that NYRA would be required to obtain permits and approvals from a variety of state and local agencies. A summary of currently anticipated actions is presented below and additional actions may be defined through the GEIS process.

### **NEW YORK STATE**

- Franchise Oversight Board: Overall project approval and approval of NYRA's capital plan
- Office of Parks Recreation and Historic Preservation: Consultation pursuant to SEQRA and the State Historic Preservation Act
- New York State Department of Environmental Conservation (NYSDEC): SPDES General Permit for Stormwater Discharges from Construction Activity (includes preparation and implementation of a stormwater pollution prevention plan during construction)
- New York State Department of Transportation: Possible Highway Work Permit(s)
- New York State Museum: Possible Section 233 Permit approval for any archeological excavation on New York State land

### **SARATOGA COUNTY**

- Departments of Planning and Public Works: Project review referral, possible highway work permits and coordination
- Saratoga County Water Authority: Possible water supply approvals
- Saratoga County Sewer District: Possible sewer approvals

### **CITY OF SARATOGA**

- Department of Planning: Project review referral
- Department of Public Works: Project review referral
- Police Department: Coordination and review of traffic management plan
- Fire Department: Coordination of Emergency Response

## **F. SUMMARY OF POTENTIAL ENVIRONMENTAL IMPACTS**

### **LAND USE, ZONING, AND PUBLIC POLICY**

The Proposed Project will not alter the basic character or use of the Saratoga Race Course and will primarily upgrade and restore the existing resources that comprise the facility. There are certain new facilities that may be built along the edges of the Project Site and near adjacent land uses—including the proposed Nelson Avenue building and new dormitories and barns in the Oklahoma and Oklahoma Annex area. Overall, the Proposed Project is expected to reinforce and improve the Race Course's presence in the study area and there would be no significant adverse

impacts on land use. Similarly, the Proposed Project is expected to remain consistent with existing zoning and public policies for the ¼ mile study area at and around the Project Site.

### **COMMUNITY SERVICES**

The Proposed Project is not anticipated to significantly increase attendance at the Race Course or result in a significant increase in demand for police, fire, or emergency medical services. The Proposed Project would not generate additional demands on schools (the Race Course does not currently generate enrollment demand from on-site residents nor would it add new enrollment with the Proposed Project). The Proposed Project is not expected to generate significant amounts of additional solid waste and recyclables. Waste will continue to be carted by private carrier and disposed of at the Hudson Falls/Fort Edward Waste Management Facility. It is expected that the Proposed Project would improve community recreational opportunities at the site. Therefore, the Proposed Project would not produce significant adverse impacts to community services.

### **GEOLOGY, SOILS, AND TOPOGRAPHY**

The Proposed Project is not expected to adversely affect the overall topography, geology, or soil characteristics of the Project Site. There are no proposed structures or construction in areas of the site containing slopes greater than 15 percent, which have the potential to increase erosion. Because the depth to bedrock is greater than 60 inches for all onsite soil types (NRCS Soil Survey) upon which new structures would be built for the Proposed Project, no impact to the City's artesian springs, including the onsite Big Red Spring, are expected to occur with development of the proposed project. Soil limitations for building foundations are limited to the wetland soils on the eastern portion of the Project Site and within the central portion of the Backstretch parcel where the Oklahoma Track is located. These areas are not affected by proposed construction activities in the Proposed Project. Temporary exposure of soils during construction will be mitigated by implementation and maintenance of erosion and sediment controls (E&SC's) to be reviewed and approved by the City and State when construction plans are finalized for each project component in the future. Chapter 242 of the City of Saratoga Springs will require such standard erosion control measures for all land disturbance actions greater than 0.1 acres required for the future, incremental build-out of the Proposed Project. Due to the depth of groundwater and bedrock, it is not expected that any soil dewatering or special engineering measures would be required for the construction of building foundations or for the installation of stormwater management practices.

### **NATURAL RESOURCES**

The overall habitat type on the Project Site would not change in the future with the Proposed Project. The required tree removal activity would not constitute a temporary or permanent adverse impact because it would be phased over time to allow for regrowth of trees; moreover, the mowed lawn and tree habitat that predominates on the Project Site is not rare or important for any sensitive species. No rare species currently occupy the Project Site. Neither the Karner blue butterfly, Frosted elfin butterfly, nor their larval host plants, occur on the Project Site and the Proposed Project would have no detrimental effect to these State or Federally-listed butterfly species. The northern long-eared bat is a forest interior species for which appropriate habitat is not present within the Project Site. It is not expected that the Proposed Project would require significant tree removal because the new facilities are proposed in an existing, developed site. Seasonal restrictions on tree cutting may be required by the U.S. Fish and Wildlife Service (USFWS) if the northern long-eared bat is federally listed, and any/all such restrictions would be

## **Saratoga Race Course Redevelopment Plan DGEIS**

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complied with. Overall, no significant impacts to natural resources are expected to occur with the Propose Project and no natural resource specific mitigation is required.

### **SURFACE WATER RESOURCES AND WETLANDS**

The Proposed Project is not expected to result in any modifications to the existing artificial pond located in the Main Race Course Infield subarea within the Saratoga Race Course's Frontside and no potential disturbance or new building construction is proposed in the easternmost portion of the Project Site where wetlands are mapped by U.S. Fish and Wildlife Service's National Wetlands Inventory (NWI). Further, it is expected that all stormwater practices can be located and constructed onsite without disturbance to onsite wetlands. Since the Proposed Project is not expected to result in disturbance to onsite surface water resources or wetlands, and no Sole Source, Primary or Principal Aquifers, or mapped 100-year or 500-year floodplains occur onsite or in the vicinity, the Proposed Project would not be expected to adversely affect surface water resources or wetlands. In addition, the proposed development would not divert existing flows away from the wetland areas.

### **STORMWATER MANAGEMENT**

In the future with the Proposed Project, new development runoff will be managed through the implementation of stormwater management practices which may include such measures as infiltration practices and porous pavement, and with standard practices including surface and sub-surface detention. Post-development peak flows rates from the site for all storm categories required to be treated will be equal to or less than existing conditions, in accordance with NYSDEC and City of Saratoga Springs requirements. Stormwater Pollution Prevention Plans (SWPPPs) for each component of the project must be reviewed and approved in the future by the City of Saratoga Springs Building/Engineering Department. Saratoga Springs regulates stormwater runoff in accordance with Chapter 242 of the City Code. For non-residential development, the City Code requires that an SWPPP must be prepared to prevent erosion/sedimentation during construction and to capture and manage runoff in the future. This applies to land disturbance activities (including clearing/grading/excavation) of 0.1 acres or more. In addition, should any disturbance exceed one (1.0) acre in size, it would apply for coverage under the NYSDEC's State Pollutant Discharge Elimination System (SPDES) General Permit for stormwater discharge from construction activities (GP-0-15-002). Separately, as part of the horse housing/feeding operations onsite, the General Permit for Concentrated Animal Feeding Operations (CAFOs) - General Permit GP-04-02, will be revised as necessary, and then submitted for review and approval by the NYSDEC. Any changes to stormwater infrastructure or changes in flow through existing infrastructure that is integrated with drainage associated with adjacent state roadways will require a drainage plan and report for NYSDOT review.

### **WATER SUPPLY**

It is estimated that the Proposed Project will generate an approximately 9.6 percent and 11.6 percent increase in total water demand generated by uses on the Race Course on both a daily and annual basis, respectively.

Annually, the total water consumption is expected to increase from about 50 million gallons to 55.29 million gallons per year. Compared to the City's overall annual consumption of about 1.5 billion gallons per year, the Race Course share of total water consumption is likely to increase slightly by 0.4 percent or from 3.2 to 3.6 percent of total consumption. On a daily basis, the Race

Course is estimated to consume about 555,555 gallons per day (gpd) during the race season and total daily demand is expected to increase by about 53,240 gpd to a new demand of 608,795 gpd. This represents a 1.0 percent increase in the City's average daily demand of 5.5 million gallons during the summer season well below the current safe yield of 7.8 million gpd (the amount a system can continuously supply). When combined with the No Build Projects' demand (development projects currently under review by the City in the Future Without the Project) of 368,044 gpd, this represents a 7.7% increase in the City's total 5.5 mgpd average daily use during summer. Therefore, it is expected that the existing system, in combination with planned capacity enhancements, will be able to safely provide the expanded water needs of the Proposed Project and no adverse impacts have been identified.

### **SANITARY SEWER SERVICE**

Projected increases in water use (and wastewater generation) onsite include 5,000 gpd from visitors, 6,000 gpd from horse stalls, and 42,240 gpd from resident dormitories, for a total increased wastewater flow of 53,240 gallons per day. On an annual basis, the anticipated increase in wastewater flow generated by the Proposed Project is 220,463 gallons from attendance, 723,507 gallons from additional horses stabled at the Race Course (including the runoff from the three additional outdoor horse washing pads), and 4.44 million gallons from workers in seasonal residence, for a total annual increase in wastewater flow of 5.38 million gallons.

The daily peak race season increase of 53,240 gpd of water usage constitutes a 28 percent increase in the current total estimated wastewater flow from the Saratoga Race Course. With the anticipated improvements to the City's conveyance infrastructure at the Adams Street pump station that are expected to be implemented with or without this new demand, the additional flow is not expected to result in adverse impacts on the sewer system or overall capacity of the County Wastewater Treatment Plant. The Saratoga County Sewer District (SCSD) No. 1 Wastewater Treatment Plant has sufficient excess capacity to handle projected wastewater flows from the Proposed Project and from development projects currently under review by the City in the Future Without the Project.

### **ENERGY AND TELECOMMUNICATIONS**

It is estimated that the Proposed Project will generate an increase in demand for electricity, gas and telecommunication services on both a daily and annual basis. The increase in demand for these services is not expected to be significant and would be partially offset by the installation of more efficient equipment, appliances, and materials. The service providers have indicated that the anticipated increase in demand related to the Proposed Project can be accommodated and no significant adverse impacts have been identified.

### **TRAFFIC AND TRANSPORTATION**

To establish conditions in the 2024 analysis year, the first step was to establish a baseline condition in the future without the proposed Saratoga improvements (the "No Build" condition). The 2024 No Build traffic volumes were established by analyzing the known development projects planned to be in place by 2024 as well as a general growth in background traffic defined by standard application of a background growth rate. From this No Build baseline, the incremental change in peak hour traffic anticipated as a result of the proposed Saratoga Race

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Course improvements are added to the network and the potential impact of this additional traffic is the basis for the DGEIS impact analysis.

Based on the modest increase in attendance as described in Chapter 1, “Project Description,” the incremental change in peak hour traffic generated by the proposed project would be approximately 114 trips during the weekday Midday peak hour, 98 trips during the weekday PM peak hour, 80 trips during the Saturday Midday peak hour, and 84 trips during the Saturday PM peak hour. Under the 2024 Build conditions, compared to the 2024 No Build conditions, there would be the following notable changes in Level of Service<sup>1</sup> (LOS) for the study area intersections as established during the DGEIS scoping process:

### *SIGNALIZED INTERSECTIONS*

- East Avenue and CR 50 – the northbound left-turn/through/right-turn lane would deteriorate from LOS D to LOS E conditions during the Saturday PM peak hour.
- East Avenue and Lake Avenue – the westbound left-turn/through/right-turn lane would deteriorate from LOS E to LOS F conditions during the Saturday Midday peak hour. The northbound left-turn/through/right-turn lane would deteriorate from LOS D to LOS E during the Saturday PM peak hour.
- Circular Street and Union Avenue – the northbound through/right-turn lane would deteriorate from LOS D to LOS E conditions during the weekday Midday peak hour.

For these impacted locations, mitigation measures include updating the signal timing to provide one to three seconds of more green time to impacted movements. These improvements will be reviewed by local and state agencies either during the public review of the DGEIS and/or during the implementation of the Proposed Project and could be implemented in coordination with the City of Saratoga Springs at any time in the future as needed.

### *UNSIGNALIZED INTERSECTIONS*

- Nelson Avenue and Wright Street – the westbound left-turn/through/right-turn lane would deteriorate from LOS D to LOS E conditions and from LOS E to LOS F conditions during the weekday Midday and Saturday Midday peak hours, respectively.
- Nelson Avenue and Crescent Street – the eastbound left-turn/right-turn lane would deteriorate from LOS D to LOS E conditions.

At these unsignalized intersections, installation of a traffic signal would mitigate the LOS back to No Build conditions; however, it is anticipated that during most of the year when there are no races, a signal would not be warranted. Therefore, it is recommended that the current Traffic Control Employee protocol at these two locations remain in effect. This protocol will be reviewed by the City of Saratoga Springs either during the public review of the DGEIS and/or during the implementation of the Proposed Project.

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<sup>1</sup> Level of service (LOS) is a description of the quality of an intersection’s operation, ranging from LOS A (indicating free-flow traffic conditions with little or no delay) to LOS F (representing over-saturated conditions where traffic flows exceed design capacity, resulting in long queues and delays). Significant adverse impacts are defined in this GEIS as: (1) any change in LOS D or better to LOS E or F; or (2) any change from LOS E to LOS F.

## **AIR QUALITY**

Based on results of the traffic capacity analysis performed for the 2024 Build Year Condition, none of the twenty-six intersections that approach or exceed LOS D would meet any of the Capture Criteria (i.e., no reductions in the source-to-receptor distances, less than 10 percent increases in traffic volumes, less than 10 percent increases in vehicle emissions, no increases in the number of queued lanes, and no speed reductions). Therefore no further analysis is warranted, and a microscale analysis is not required and no significant adverse air quality impacts are expected to occur as a result of the Proposed Project's mobile sources.

The Proposed Project would not be a major source of stationary source emissions. The only stationary sources of air pollutants associated with the Proposed Project would be the utility courtyard with HVAC facilities and new kitchen facilities in the proposed Nelson Avenue Building, which uses gas-fired stoves for cooking during the summer season for approximately 40 days per year. Therefore, it is not expected that the Proposed Project would result in significant adverse air quality impacts due to stationary sources.

Based on the analysis presented in Chapter 12, Air Quality, the Proposed Project is not expected to cause any new violations of air quality standards or exacerbate any existing violations for the projected 2024 Build condition. Therefore, the Proposed Project would not have a significant adverse impact on local air quality and would be consistent with the requirements of the New York State Implementation Plan (SIP), which identifies how the State will attain and/or maintain National Ambient Air Quality Standards (NAAQS).

## **NOISE**

Comparing the Proposed Project mobile source (cars/trucks) noise levels with existing noise levels, at all sites, the maximum increase in  $L_{eq(1)}$  noise level would not exceed NYSDEC's threshold for a significant noise level increase of 6.0 dBA. The maximum predicted noise level increments include an increase of 2.1 dBA at site 2 (Union Avenue at Ludlow Street) and 1.2 dBA at site 3 (Nelson Avenue at Wright Street) during the early AM truck delivery peak period. Both of these increments would be considered barely perceptible and not significant according to NYSDEC criteria.

Regarding stationary sources, comparing the Proposed Project noise levels associated with mechanical noise with existing noise levels, assuming the proposed utility courtyard associated with the Nelson Avenue Building is designed to meet the not-to-exceed noise emission level, the maximum increase in  $L_{eq(1)}$  noise level would not exceed NYSDEC's threshold for a significant noise level increase of 3.0 dBA during a night-time period.

Based on the analysis performed, operation of the Proposed Project would be in compliance with the City of Saratoga Springs' restrictions on noise. In addition, pursuant to the NYSDEC noise guidance document (Assessing and Mitigating Noise Impacts, DEP-00-1), the Proposed Project would not be expected to result in significant adverse noise impacts at residences and sensitive receptors immediately adjacent to the Project Site.

## **ECONOMIC CONDITIONS**

The analysis concludes that the Proposed Project would not adversely affect the population or employment characteristics of the study area since the project is anticipated to generate no new permanent residents and only modest levels of new employment.

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The Saratoga Race Course has been an important part of the local and regional economy. With the Proposed Project, the existing facilities of the Race Course would be restored and upgraded, allowing the facility to serve current and future generations of visitors and enabling the facility to continue to be an important part of the local and regional economy. The project is not expected in and of itself to generate a substantial increase in attendance or new expenditures that would generate new tax revenues. Therefore, the project is not expected to generate significant growth-inducing changes. However, in the future with the Proposed Project, it is likely that tax revenues to Saratoga Springs, Saratoga County, and New York State could increase in proportion to the anticipated modest increases in attendance (up to 5 percent on any given weekday and up to 2 percent on a Saturday) and increased food and beverage sales.

### **CULTURAL RESOURCES**

#### *ARCHITECTURAL RESOURCES*

As noted above, the Saratoga Race Course is listed on the S/NR as part of the Union Avenue Historic District. One hundred and seventy six contributing structures are located on the Race Course. A contributing resource is defined as a building, structure, object, or site within the boundaries of a Historic District, which reflects the significance of the District as a whole. The historic landscape of the Race Course is also a contributing resource. Character-defining landscape features are defined as specific landscape features that relate to and collectively define the historic character of the Race Course Landscape. Specific contributing resources and character-defining landscape features, as approved by the New York State Office of Parks, Recreation and Historic Preservation (OPRHP), are inventoried in Tables A-1, A-2, and A-3.

The Proposed Project's overall impact on the historic character of the Race Course is expected to be beneficial in that it aims to preserve and restore the historic character of the Race Course as a whole. This analysis has identified no adverse impacts on contributing buildings or on the overall historic landscape of the Race Course. The Background Projects identified in "Chapter 1, Project Description", such as routine repairs and maintenance, the refurbishment of non-contributing buildings, alteration of landscape features identified as non-character-defining features, and excavation in areas identified as possessing low archaeological sensitivity would not adversely affect cultural resources. As part of the array of planned elements and conceptual improvements, modifications to some of the contributing buildings and character-defining landscape features would occur. Because the project involves ongoing design and refinement of selected improvements, a Draft Letter of Resolution (LOR) between NYRA, FOB, OGS, and OPRHP has been prepared (see **Appendix F-1**), which sets forth a process for avoiding potential adverse impacts to contributing resources and to the S/NR-listed Race Course as a whole. The Draft LOR includes stipulations governing physical alterations to contributing buildings, physical alterations to character-defining landscape features, and new construction and exterior alterations to non-contributing buildings.

No demolition or relocation of contributing buildings is planned, and therefore no adverse impacts have been identified. Proposed Project elements have been identified, however, that would impact contributing resources directly or indirectly, through alteration or rehabilitation. Because the impact of these Project elements is not expected to be adverse, provided that the final design and construction are carried out in a sensitive manner, these changes have been identified as Conditional No Adverse Impacts. The Proposed Project would also result in the construction of several new buildings, which would introduce new features into the historic setting of the Race Course. The construction of these new buildings has also been identified as a

Conditional No Adverse Effect, provided that the new features are designed in a manner that is sensitive to the historic context in keeping with guidelines set forth in the LOR. The LOR includes guidelines for sensitive design of new features and for alteration to existing buildings and a procedure for consultation with OPRHP to obtain approval of the design as appropriate. It also includes measures to protect contributing buildings from adjacent construction activities that could cause inadvertent damages.

#### *ARCHAEOLOGICAL RESOURCES*

An archaeological documentary study (Phase 1A study) was prepared to assess the potential for the Project Site to contain archaeological resources. The Phase 1A Study concluded that based on documentary research and a site walkover, portions of the Race Course are sensitive for (may contain) historic-period archaeological resources at depths of greater than 12 inches below ground surface. A limited portion of the Lowlands area of the Race Course has been identified as possessing sensitivity for precontact period deposits (deposits relating to Native American habitation before European contact) below ground surface.

Areas of archaeological sensitivity were categorized as low sensitivity; low to moderate sensitivity; and moderate sensitivity. No areas of high sensitivity were identified on the Project Site. Six areas of “low to moderate” sensitivity for archaeological resources were identified and 11 areas of moderate sensitivity for historic-period archaeological resources were identified. The remainder of the Race Course was characterized as possessing low sensitivity for historic or precontact period archaeological deposits. In areas identified as possessing low sensitivity for archaeological resources, no further archaeological investigation or consultation is considered necessary prior to undertaking ground-disturbing activities.

Of the 17 archaeologically sensitive areas identified in the Phase 1A study, this analysis indicates that eight of these areas may be affected by specific Proposed Project elements. The one area sensitive for precontact period resources would not be affected. Prior to excavating in areas with “low to moderate” or “moderate” sensitivity, archaeological field testing should be undertaken to determine the presence or absence of significant archaeological resources. If Proposed Project elements would adversely impact significant archaeological resources, measures to avoid, minimize or mitigate those impacts would be developed in consultation with OPRHP. A protocol for the identification, avoidance, and mitigation of any impacts to archaeological resources is provided in the LOR.

#### **VISUAL RESOURCES**

As part of the planned elements and conceptual improvements, no adverse impacts on cultural resources were identified, although some historic buildings and character-defining landscape features would be altered, as detailed in Chapter 15, “Cultural Resources.” As noted above, because the project involves ongoing design and refinement of selected improvements, a Draft LOR between NYRA, FOB, OGS, and OPRHP has been prepared, which sets forth a process for avoiding potential adverse visual impacts to contributing resources. The categories of potential visual impacts to historic resources identified as part of this analysis which would require ongoing consultation with OPRHP to implement the provisions of the LOR include: 1) Proposed Project elements that would result in the construction of new buildings in proximity to contributing resources on the Project Site and 2) potential impacts to landscape features that help define the overall character of the historic Race Course landscape (which is itself considered a contributing feature to the Historic District). These impacts would not be expected to be adverse,

provided that the final design and construction are carried out in conformance with the LOR. The LOR includes a procedure for identifying measures to avoid potential adverse impacts. It also sets forth guidelines for sensitive design and a procedure for consultation with OPRHP to obtain approval of the design.

### **HAZARDOUS MATERIALS**

With the implementation of the recommended measures described in Chapter 17, “Hazardous Materials,” no significant adverse impacts related to hazardous materials would be expected to occur as a result of construction activities for the Proposed Project. These include laboratory analysis of subsurface (soil/groundwater) samples in regions with the potential to harbor contamination from past use, including pesticide storage areas, workshop and materials storage areas, maintenance buildings, garage, and carpenter’s shop. Additional measures to be followed to avoid adverse impacts include characterization of soil to be disposed offsite, implementation of a Construction-Phase Environmental Health and Safety Plan (CHASP), and proper removal and disposal of any suspected asbestos-containing materials or lead-based paint. Following construction of the Proposed Project, there would be no further potential for adverse impacts associated with that ground disturbance.

### **CONSTRUCTION**

The Proposed Project is anticipated to result in an approximately 9 year build-out with ongoing construction activities occurring at a pace controlled by an estimated \$15 million per year capital budget. It is anticipated that the various project elements identified in the Proposed Project would include concurrent and overlapping construction activities. The hours and periods of construction activity would be staggered over the course of the construction season to avoid the racing season, comply with the limitations on hours of construction during the spring and fall training seasons. Up to 100 construction-related workers per year would likely be on-site during the 10-month construction season.

Overall, the project is not expected to result in significant adverse impacts resulting from construction activities for most of the environmental assessment areas considered in the DGEIS. The ability to avoid and minimize potential impacts is based on the coordination and management of construction activities utilizing key construction management practices as summarized below.

- Coordination with the City of Saratoga Springs and other agencies as appropriate to manage short-term and temporary closures of roads or lanes.
- Adherence to sediment and erosion controls during construction phases.
- Properly muffling and maintaining construction vehicles and equipment, restrictions on idling, and implementation of dust control measures.
- Implementation of best management practices related to material storage and spill release.
- Construction Protection Plan for work on and adjacent to contributing historic resources.
- Field testing for potential archeological resources in eight areas identified with low to moderate or moderate archaeological sensitivity.
- Pre-construction due diligence to test for the potential presence of hazardous materials at locations on both the Frontside and Backstretch and adherence to a Construction-Phase Environmental Health and Safety Plan (CHASP) established for the Project Site. Elements

of the CHASP will include sampling of excavated soil generated during redevelopment that would be placed as shallow soil; management of soil and fill in accordance with all applicable regulations; and removal of any tanks, drums, or other sources of subsurface contamination in accordance with all applicable regulations.

### **UNAVOIDABLE ADVERSE IMPACTS**

The Proposed Project incorporates specific measures intended to avoid or minimize significant adverse impacts, specifically including:

- Adherence to sediment and erosion controls during construction phases.
- Adherence to an LOR between NYRA, OPRHP, FOB, and OGS providing guidelines and requirements related to historic resources, including a Construction Protection Plan (CPP) for work on and adjacent to contributing historic resources and field testing for potential archeological resources in 8 areas identified with archaeological sensitivity that may be affected by the Proposed Project.
- Pre-construction due diligence to test for the potential presence of hazardous materials at locations on both the Frontside and Backstretch and adherence to a CHASP established for the Project Site by the construction manager.
- On-going coordination with the City of Saratoga Springs on traffic management plans during racing season and any other coordination as necessary during the construction period.

With these measures in place, the Proposed Project is expected to result in no significant unavoidable adverse impacts.

### **IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES**

Certain resources, both natural and manmade, would be expended in the construction and operation of the Proposed Project. These resources include use of the land, building materials, energy, and the human effort (time and labor) required to develop, construct, and operate the Proposed Project. These resources are considered irretrievably committed because their reuse for some purpose other than the Proposed Project would be highly unlikely.

The actual building materials used in the construction of the Proposed Project (wood, steel, concrete, and glass, etc.) and energy, in the form of gas, propane, and electricity, consumed during the construction and operation of the Proposed Project by construction equipment and the various mechanical systems (heating, hot water, and air conditioning) would also be irretrievably committed to this particular undertaking. None of these impacts are considered significant.

### **GROWTH INDUCING EFFECTS**

The goal of the Proposed Project is to retain and lengthen the stay of existing patrons, sustain and attract visitors into the future, and provide a broader spectrum of service choices and offerings for guests that can increase overall revenues from Race Course operations while preserving the historic landscape and character of the Saratoga Race Course. In addition, a portion of the proposed improvements are focused on enhancing operational efficiencies that benefit the racing participants such as upgrades to the stables and dormitories. The Proposed Project is not expected to lengthen the racing season and peak attendance and overall attendance volumes are not expected to increase substantially.

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In addition, the potential increase in demand for labor to support construction or permanent operations is relatively small and would be drawn from the existing local and regional labor force. Therefore, while the Proposed Project is not expected to generate growth-inducing effects beyond sustaining the Race Course into the future, it is noted that the Proposed Project will help to strengthen and retain the vitality of this key economic sector.

### **USE AND CONSERVATION OF ENERGY**

The Proposed Project will result in the renovation and restoration of infrastructure and buildings throughout the property as well as a number of new buildings and amenities. For both new and existing buildings, it is noted that the Race Course is seasonal in utilization and the buildings are basically vacant from late fall until spring thereby using minimal energy during the peak indoor heating and lighting season. Nonetheless, buildings will be designed and constructed so that the design and selection of equipment and systems for the purpose of energy conservation would comply with the applicable provisions set forth in the New York State Energy Conservation Construction Code and the New York State Uniform Fire Prevention and Building Code (Building Code).

## **G. MITIGATION MEASURES**

### **LAND USE, COMMUNITY CHARACTER, ZONING, AND PUBLIC POLICY**

No significant adverse impacts to land use, zoning and public policy would result from the Proposed Project and no mitigation would be required.

### **COMMUNITY SERVICES**

No significant adverse impacts to community services would result from the Proposed Project and no mitigation would be required.

### **GEOLOGY, SOILS AND TOPOGRAPHY**

Through compliance with the City of Saratoga Springs Code (Chapter 242) which applies to land disturbances of 0.1 acres or greater, and through the implementation of a New York State approved SWPPP, the Proposed Project would avoid any adverse impacts to soils and topographic resources. Principally through use of sedimentation and erosion control measures, discussed in Chapter 7, "Stormwater Management," the movement of soil downslope or downstream would be avoided. This would prevent detrimental impacts to receiving waters and wetlands. These measures would be installed prior to construction, and would be monitored and maintained during construction.

### **NATURAL RESOURCES**

No significant adverse impacts to natural resources are expected to occur with the Proposed Project. Therefore, no natural resource specific mitigation is required. As explained in Chapter 7, "Stormwater Management," erosion controls and stormwater management measures would be developed for each component of the Proposed Project with each phase of development. These measures would prevent the migration of sediment offsite and the potential for detrimental water quality impacts to offsite resources, including offsite habitats and wildlife.

## **SURFACE WATER RESOURCES AND WETLANDS**

It is not expected that any direct (fill) or indirect (water quality) impacts to onsite or offsite wetlands and waters would occur with the Proposed Project. All areas of new building and new impervious surfaces would provide for stormwater runoff treatment within new management practices, as described in Chapter 7, “Stormwater Management”. In this way, indirect water quality impacts to onsite and offsite waters and wetlands would be avoided.

## **STORMWATER MANAGEMENT**

No adverse stormwater impacts would be expected to effect on- or off-site infrastructure with the Proposed Project. As noted in Chapter 7, “Stormwater Management,” any new incremental change in runoff based on the development of new impervious surfaces will be designed such that post-development peak flows for all storm categories required to be treated will be equal to or less than existing flows, in accordance with NYSDEC and City of Saratoga Springs requirements. Therefore, no additional mitigation is required.

The required implementation of erosion and sediment control measures are presented in Chapter 18, “Construction.”

## **WATER SUPPLY**

New plumbing fixtures must comply with NYS Water Saving Plumbing Fixtures Law (Section 15-0314 of the Environmental Conservation Law). Based on the ability of the City’s water supply system to accommodate the Proposed Project’s estimated water demand, no mitigation is required.

## **SANITARY SEWER SERVICE**

New plumbing fixtures installed on the Project Site would be required to comply with NYS Water Saving Plumbing Fixtures Law (Section 15-0314 of the Environmental Conservation Law). Based on the ability of the City’s sewer system to accommodate the Proposed Project’s estimated sewage demand, no mitigation is required.

## **ENERGY AND TELECOMMUNICATIONS**

The Proposed Project will comply with requirements of the New York State Energy Conservation Construction and Uniform Fire Prevention Building Codes. In addition, it is expected that the new construction and renovation proposed as part of the Proposed Project would incorporate more energy efficient equipment, appliances and materials.

When specific plans for building improvements and new construction/renovations are completed for the Backstretch, NYRA will coordinate with National Grid to ensure the safe and efficient delivery of electrical and gas service to the site.

No mitigation is required to offset the increase in demand for telecommunication services.

## **TRAFFIC**

For the impact locations described above, possible mitigation measures could include signal retiming to shift one to three seconds of green time to impacted movements. These improvements will be reviewed by local and state agencies and could be implemented in

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coordination with the City of Saratoga Springs or NYSDOT at any time in the future as needed. **Table S-2** presents the improvement measures for each impacted signalized intersection.

At the Nelson Avenue/Wright Street and Nelson Avenue/Crescent unsignalized intersections a signal would mitigate the LOS back to No Build conditions; however, it is anticipated that during most of the year when there are no races, a signal would not be warranted. Off-season counts would need to be collected to verify the volumes do not meet the signal warrants. Therefore it is recommended that the current Traffic Control Employee protocol at these two locations remain in effect.

**PUBLIC TRANSPORTATION**

No significant changes in public transportation conditions are expected with the Proposed Project.

**Table S-2**  
**2024 No Build, Build, and Build with Mitigation Conditions Level of Service Analysis**

Intersection	2024 No Build				2024 Build				2024 Build with Mitigation				Improvement Measures	
	Lane Group	V/C Ratio	Delay (sec)	LOS	Lane Group	V/C Ratio	Delay (sec)	LOS	Lane Group	V/C Ratio	Delay (sec)	LOS		
<b>Weekday Midday Peak Hour (12:00 PM - 1:00 PM)</b>														
<b>Circular Street &amp; Union Avenue</b>														
Westbound	L	0.45	30.5	C	L	0.45	30.5	C	L	0.45	30.5	C	-Signal Retiming (shift 1 second of green time from the EB phase to the NB/SB phase).	
	R	0.33	7.5	A	R	0.33	7.5	A	R	0.33	7.5	A		
Northbound	TR	<b>0.97</b>	<b>53.6</b>	<b>D</b>	TR	<b>0.98</b>	<b>55.7</b>	<b>E</b>	TR	0.96	50.1	D		
Southbound	L	0.72	24.6	C	L	0.74	25.7	C	L	0.76	27.7	C		
	T	0.33	7.4	A	T	0.33	7.4	A	T	0.33	7.4	A		
Intersection		30.8		C	Intersection		31.9		C	Intersection		30.2		C
<b>Saturday Midday Peak Hour (12:00 PM - 1:00 PM)</b>														
<b>East Avenue &amp; Lake Avenue</b>														
Eastbound	LT	0.68	18.7	B	LT	0.69	19.1	B	LT	0.67	17.7	B	-Signal Retiming (shift 1.5 seconds of green time from the NB/SB phase to the EB/WB phase).	
	R	0.05	2.9	A	R	0.05	2.9	A	R	0.05	2.6	A		
Westbound	LTR	<b>1.06</b>	<b>72.0</b>	<b>E</b>	LTR	<b>1.11</b>	<b>92.5</b>	<b>F</b>	LTR	1.05	67.5	E		
Northbound	LTR	0.30	15.0	B	LTR	0.30	14.9	B	LTR	0.31	16.1	B		
Southbound	LTR	0.89	42.6	D	LTR	0.91	44.9	D	LTR	0.94	53.1	D		
	Intersection		43.7		D	Intersection		52.0		D	Intersection			44.5
<b>Saturday PM Peak Hour (6:00 PM - 7:00 PM)</b>														
<b>East Avenue &amp; CR 50</b>														
Eastbound	L	0.02	7.2	A	L	0.02	7.2	A	L	0.02	7.4	A	-Signal Retiming (shift 1 second of green time from the EB/WB phase to the NB/SB phase).	
	TR	0.42	14	B	TR	0.42	14.3	B	TR	0.42	14.6	B		
Westbound	L	0.13	7.3	A	L	0.13	7.5	A	L	0.13	7.7	A		
	TR	0.48	11.5	B	TR	0.49	11.7	B	TR	0.49	11.9	B		
Northbound	LTR	<b>0.86</b>	<b>54.4</b>	<b>D</b>	LTR	<b>0.87</b>	<b>55.3</b>	<b>E</b>	LTR	0.87	53.9	D		
Southbound	LTR	0.65	53.1	D	LTR	0.63	51.4	D	LTR	0.62	50.2	D		
Intersection		20.9		C	Intersection		21.3		C	Intersection		21.2		C
<b>East Avenue &amp; Lake Avenue</b>														
Eastbound	LT	0.72	22.9	C	LT	0.72	22.9	C	LT	0.75	26	C	-Signal Retiming (shift 3 seconds of green time from the EB/WB phase to the NB/SB phase).	
	R	0.04	1.7	A	R	0.04	1.7	A	R	0.04	1.9	A		
Westbound	LTR	0.77	23.0	C	LTR	0.77	23.0	C	LTR	0.82	28.4	C		
Northbound	LTR	<b>0.97</b>	<b>51.0</b>	<b>D</b>	LTR	<b>1.01</b>	<b>60.7</b>	<b>E</b>	LTR	0.96	46.5	D		
Southbound	LTR	0.35	15.2	B	LTR	0.36	15.3	B	LTR	0.34	14.5	B		
	Intersection		31.7		C	Intersection		35.6		D	Intersection			32.6
<b>Notes: Bold indicates impact</b> <b>These locations currently do not use a Traffic Control Employee.</b> L = Left Turn, T = Through, R = Right Turn; LOS = Level of Service. V/C = Volume to Capacity; Delay = Seconds per Vehicle; LOS = Level of Service.														

*PEDESTRIAN AND BICYCLE CONDITIONS*

No significant adverse impacts in pedestrian and bicycle conditions are expected with the Proposed Project. Adjacent to the racetrack, with the proposed sidewalk and plaza improvements at the entrance gates as discussed above, pedestrian circulation and safety is expected to improve. It is recommended that bicycle racks be installed on site for visitors or employees who choose to bike to the Race Track.

*ACCIDENT DATA*

With only minor increases in traffic volumes in the study area from the Proposed Project and the proposed mitigation measures in-place coupled with the continuation of the Traffic Management Plan (TMP) as outlined above, no significant increases in accidents are anticipated within the study area.

**PARKING**

Based on the estimated increase in attendance as presented in Table 11-8 of Chapter 11, “Transportation,” it is estimated that the Proposed Project will generate a localized parking demand at or near the Race Course of 198 new parking spaces on a weekday and 146 spaces on a Saturday. At the same time, the proposed Frontside improvements would be expected to result in the loss of parking capacity of about 646 spaces (Lots U, V, and X). The new and diverted demands are expected to be accommodated by expanding the utilization of NYRA’s property, particularly in the Lowlands area, where a 600-car parking lot would be available. Consistent with existing practices, no improvements or grading would be required to accommodate this additional parking in the Lowlands. In addition, parking demand may also be absorbed by private and public lots scattered throughout the surrounding area and into downtown.

*TRAFFIC MANAGEMENT PLAN (“TMP”)*

The TMP implemented by the Saratoga Police Department in coordination with the Applicant, and detailed in Chapter 11, Traffic and Transportation, would need to continue to ensure the efficient processing of vehicles and to minimize pedestrian and vehicular conflicts. It is recommended that with the enhanced drop-off/pick-up areas on Wright, Lincoln and East End Avenues that personnel be staffed to facilitate the drop-offs and pick-ups activity.

**AIR QUALITY**

Since there would be no significant adverse air quality impacts from the Proposed Project’s stationary or mobile source emissions during operation, mitigation is not required. Mitigation for potential air quality impacts during construction is discussed separately in the Construction section.

**NOISE**

As described in Chapter 13, “Noise,” in place of full design details for the utility courtyard, which are not yet complete, a not-to-exceed noise emission level was developed for the utility courtyard located adjacent to the Nelson Avenue Building to ensure it would not have the potential to result in a significant impact at the residences across Nelson Avenue. Provided these criteria are met with the proposed utility courtyard mechanical equipment ultimately

designed/installed, the Proposed Project would not have the potential to result in significant adverse noise impacts at nearby sensitive receptors.

### **ECONOMIC CONDITIONS**

As analyzed in Chapter 3, “Community Services,” the Proposed Project is not expected to result in new demand for community services or a change in the cost of providing community services. The Proposed Project would be expected to have no impact or fiscal cost due to changes in demographic or workforce characteristics. Therefore, the Proposed Project would not adversely impact the study area populations or study area businesses and no mitigation is required to offset project generated changes.

### **CULTURAL RESOURCES**

The Proposed Project involves ongoing design and refinement of selected improvements. A Draft LOR between NYRA, FOB, OGS, and OPRHP has been prepared, which sets forth a mechanism to avoid, minimize, or mitigate potential adverse impacts. In terms of architectural resources, it is expected that all adverse impacts can be avoided. If an adverse impact to a contributing resource or an archaeological resource cannot be avoided, mitigation measures would be identified and implemented by NYRA in consultation with FOB, OGS, and OPRHP.

### **VISUAL RESOURCES**

The Proposed Project is not expected to result in any significant adverse impacts to visual resources or visual character on the Project Site or within the Study Area. Thus, no mitigation is required.

### **HAZARDOUS MATERIALS**

With the implementation of the additional due-diligence measures to test for and avoid impacts from hazardous materials with each component of the Proposed Project, as outlined in Chapter 17, “Hazardous Materials,” no significant adverse impacts related to hazardous materials would be expected to occur as a result of the construction activities for the Proposed Project.

### **CONSTRUCTION**

The Proposed Project is anticipated to result in an approximately 9 year build-out with ongoing construction activities occurring at a pace controlled by an estimated \$15 million per year capital budget. It is anticipated that the various project elements identified in the Proposed Project would include concurrent and overlapping construction activities. The hours and periods of construction activity would be staggered over the course of the construction season to avoid the racing season, comply with the limitations on hours of construction during the spring and fall training seasons. Up to 100 construction-related workers per year would likely be on-site during the 10-month construction season.

The Proposed Project is not expected to result in significant adverse impacts resulting from construction activities for the environmental assessment areas considered in the DGEIS. The ability to avoid and minimize potential impacts is based on the coordination and management of construction activities utilizing key construction management practices as summarized below.

- Proper storage of equipment and materials.

- Proper management of solid waste during construction.
- Coordination with the City of Saratoga Springs and other agencies as appropriate to manage short-term and temporary closures of roads or lanes.
- Adherence to sediment and erosion controls during construction phases.
- Construction Protection Plan for work on and adjacent to contributing historic resources.
- Field testing in eight areas identified as possessing archaeological sensitivity that could be affected by the Proposed Project.
- Pre-construction due diligence to test for the potential presence of hazardous materials at locations on both the Frontside and Backstretch and adherence to a Construction-Phase Environmental Health and Safety Plan CHASP established for the Project Site by the construction manager.

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