Chapter 18: Construction

A. INTRODUCTION

As detailed in Chapter 1, "Project Description," the Proposed Project is a multi-year redevelopment project for both the Frontside and Backstretch of the historic Saratoga Race Course. This DGEIS is intended to examine the potential impacts from implementation of the Proposed Project that include areas of new construction, restoration, and other improvements to enhance the visitor experience as well as the quality and efficiency of racing facilities. While the Proposed Project represents a comprehensive range of elements that is anticipated to be built out over the next decade, it is noted that the actual completion of any specific plan element is not certain and will be based on the availability of capital improvement funding and strategic planning factors that could change over time.

As a result, the Proposed Project will result in ongoing construction activities over a long period of time and that must occur within the constraints imposed by the active racing seasons. This Chapter examines the potential for environmental impacts generated by construction activities and establishes thresholds and guidelines that will minimize and mitigate construction period effects.

PRINCIPAL CONCLUSIONS

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, and 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.
- 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 sensitivity.

- Pre-construction due diligence to test for the potential presence of hazardous materials at locations on both the Frontside and Backstretch, as described in the Phase 1 Environmental Site Assessment and Chapter 17, Hazardous Materials of this DGEIS, and adherence to a Construction-Phase Environmental Health and Safety Plan (CHASP) prepared by NYRA and established for the Project Site.

B. CONSTRUCTION ACTIVITY AND PHASING

The anticipated implementation of construction activities assumes capital expenditures of approximate $15 million dollars per year. This is expected to enable NYRA to work on several projects concurrently at various stages of design, permitting, construction, and completion.

CONSTRUCTION MANAGEMENT AND OVERSIGHT

The Proposed Project would be implemented by NYRA based on the availability of financial resources, the readiness of design and permitting, and identified priorities for any combination of Proposed Project elements.

NYRA will utilize an owner's representative/program manager to oversee the construction process and the management of concurrent projects including implementation and maintenance of proposed mitigation. This overarching team may be augmented by retaining project-specific construction managers, general contractors and/or prime contractors to manage and/or perform construction work, depending upon the type, size, or timing of a specific project.

CONSTRUCTION PROCESS

The Proposed Project lays out a series of elements that can be implemented over a long term build-out. These elements have been developed at a concept level to define program elements, their anticipated size and location, and to establish design parameters. However, each individual project will have to go through a typical construction process that, for the larger projects that have been identified, can be expected to be two to four years in duration, as set forth in the following steps:

DESIGN, PERMITTING, AND BIDDING

Over the first six to ten months, each project will require architectural and engineering design work and review to obtain building permits from OGS and other regulatory approvals or permits.[1] With a final design plan in place, the members of the project team can then bid the contracts and secure the construction team.

PRE-CONSTRUCTION

Once the construction team is in place, the pre-construction activities would likely be a three-to-six-month effort. This includes: final surveying and ground layout of construction plans; relocation of existing uses, activities, or utilities; due diligence testing and potential remediation

[1] For projects that fall within the evaluated impact thresholds (i.e., size, location, and use) as established and analyzed in the SEQRA evaluation of this project, of which this DGEIS is a part, no further environmental assessment would be required as part of the OGS or other state or local agency discretionary permitting and other approval processes.

of subsurface conditions, additional cultural resource-related testing that may be necessary, fabrication and materials purchasing. Should additional site constraints be identified, such as hazardous materials identified during Phase 2 testing, these will be remediated prior to site disturbance.

CONSTRUCTION AND SEASONAL LIMITATIONS

Direct construction activities for each element of the Proposed Project would be expected to occur over a nine (9) to 36 month period depending on the size of any given element and where construction activities occur during the seasonal construction cycle.

The seasonal limitations on construction activity add a level of complexity to the management of construction activities at the Race Course. These limitations restrict construction activities during the pre-season period, beginning in April when horses and staff begin to arrive and start training through the start of racing season, a direct prohibition on construction activities during the six week race season, and a limitation on activity after the race season is over while there are still horses and training on-site (through November 15). In summary, the approximate dates for key construction season periods consist of:

- November 15th to April 15th – no restrictions and an assumption that typical construction workdays as established by the City of Saratoga Noise Code would be utilized (7:30 AM to 6:00 PM, Monday through Friday)
- April 1 to October 31 – no tree removal would be allowed based on the USFWS (2014) interim guidelines for avoiding impacts to the northern long-eared bat
- April 15 to July 15th – no construction activities during morning training sessions and an assumption of an 11:00 AM to 6:00 PM shift, Monday through Friday)
- July 15 to September 15th – no construction activities during racing season
- September 15 to November 15 – no construction activities during morning training sessions and an assumption of an 11:00 AM to 6:00 PM shift, Monday through Friday)

In general, it is anticipated that projects involving new construction of buildings would adhere to the following sequencing: excavation and foundation work would be initiated and completed in the spring, building structures and outer shells would be completed and closed-in during the fall. Interior work and fit-outs would be completed over the winter months.

POST-CONSTRUCTION CLOSE OUT

Final punch-list and building opening is typically a three to six month effort that would follow completion of the construction activities and would generally be in the winter and spring leading up to its use in the next racing season. Any impact avoidance measures implemented during construction, such as erosion controls or construction traffic management plan components, would be removed/eliminated only after final completion of construction and restoration/stabilization efforts are complete.

PROJECT ACTIVITY

In consideration of the construction team responsibilities and the alignment of capital financing, it is anticipated that project elements could be implemented concurrently, with the following considerations:

- No more than two large construction elements (project elements that require more than 18 months for construction) would be in the same stage of the construction process at the same time (i.e., two projects in the design and permitting phase or in the construction phase at the same time)
- Smaller projects (projects that can be constructed in less than 18 months) would be scheduled with the same construction limitations, but would likely have shorter overall implementation schedules and could be done concurrently with larger efforts underway. It is anticipated that up to four smaller project elements could be run concurrently to larger

CONSTRUCTION STAGING

Due to the general size of the Project Site and the extensive areas of undeveloped areas, construction staging and storage of materials is expected to be fully contained on the site. Location of vehicle and materials storage, soil stockpile areas, etc. would be developed project to project initiation. There would be no long term street or lane closures necessary to allow for on-site construction activities, although occasional and temporary closures could occur related to construction activities at or adjacent to a public street (i.e., new curb cuts or fencing) or the moving of construction equipment. Similarly, all parking for construction workers at the site will be accommodated on site and would not utilize local streets (see traffic management plan discussion, below).

The project team will coordinate with the City of Saratoga Springs and other agencies as necessary to coordinate oversight of construction activities.

C. FUTURE WITHOUT THE PROPOSED PROJECT

As described in Chapter 1: Project Description, NYRA is regularly implementing on-going repair and maintenance initiatives throughout the Saratoga Race Course Project Site. In addition, NYRA has specific improvements or projects underway at any given time, including those that have gone through permitting and review by OGS or other agencies.

Independent of the Proposed Project, NYRA has a continued program of maintenance and upgrades to the current facility. These are not part of the Proposed Project and would not be considered discretionary actions subject to individual SEQRA review. Currently, with or without the Proposed Project, NYRA has several projects underway, and/or planned that include:

- Installation of 750 new HD televisions throughout the site
- Installation of an enhanced sound systems
- Installation of 125 new picnic tables
- Installation of 3 new video walls
- Installation of the event tent
- Installation of Trakus (high-tech system that enables television viewers to track horses position throughout the race)
- Expansion of the playground area
- Upgrades to restroom areas
- Expansion of Saratoga Porch outdoor dining area
- Concrete Block Dormitory Refurbishment (dormitories 100, 101, 115, 116, 120 & 121)

- Cottage/Wood Bunk House Refurbishment
- Barn Electrical Upgrades/Reconstruction
- Site Utility Upgrades & Replacements
  Horse Movement & Safety Upgrades

Four of the refurbishment dormitory projects were completed in the summer of 2014. As noted above, any number of smaller projects are expected to be coordinated with larger construction elements and concurrent projects including these projects that will happen with or without the Proposed Project. The construction of these projects will be coordinated and managed by the project team.

D. POTENTIAL CONSTRUCTION RELATED IMPACTS

Based on the construction management parameters and phasing (i.e., seasonal limitations on construction activities), this section assesses the potential for the overall implementation of the Proposed Project to generate adverse impacts in the key analysis areas outlined in the DGEIS.

LAND USE, COMMUNITY CHARACTER, ZONING AND PUBLIC POLICY

Since construction activities would be wholly contained on site and would be managed on a year to year basis, the Proposed Project's construction activities would not be expected to result in significant adverse impacts on land use, community character, zoning, and public policy.

COMMUNITY SERVICES

With an estimated average of about 100 construction jobs over the 10 month construction season, it is assumed that the current local and regional labor force would accommodate the additional worker demand. Therefore, since it is expected that these workers already are living and working in the area, no additional demand for community services (police, fire, emergency medical, healthcare, or schools) would be required to support the construction workers. Emergency services, if needed, would continue to be provided from existing resources in the region, with back-up from Mutual Aid, if necessary. In addition, since many of these workers are permanent residents to the region, no impacts on schools and other community services are anticipated. Since construction activities would be wholly contained on site and would be managed on a year to year basis, it is not anticipated that long-term road closures and other off-site disruptions would require additional demands on local services. The Construction Manager will coordinate with the City and service providers on any temporary closures or interruptions. Overall, the construction activities would not be expected to result in significant adverse impacts on community services.

GEOLOGY AND SOILS

As noted in Chapter 4: Geology, Topography, and Soils, the Proposed Project overall is expected to have no adverse impact on the underlying local and regional conditions. With no proposed structures in areas of the site containing slopes greater than 15 percent or in areas with known soil limitations, and a depth to bedrock greater than 60 inches for all onsite soil types, construction activities are expected to have no impact to the City's artesian springs, as none occur onsite and no soil dewatering or specific engineering measures would likely be required for the construction of building foundations or for the installation of stormwater management

practices. Adherence to erosion and sediment controls will minimize the potential for construction-related impacts at or near the Project Site.

NATURAL RESOURCES

Since construction activities would be undertaken in previously disturbed areas of the Project Site, no adverse impacts during construction would occur to existing natural resources on the site. Tree clearing would be limited to the winter hibernating period of the Long-eared Bat, which occurs from October 31 to March 31. Adherence to erosion and sediment controls will minimize the potential for construction-related impacts at or near the Project Site.

WETLANDS AND WATERS

Construction activities would not result in disturbances to on-site water resources or the NWI wetlands located in the easternmost portion of the Project Site. Further, it is expected that all stormwater practices can be located and constructed onsite without disturbance to onsite wetlands. Adherence to erosion and sediment controls will minimize the potential for construction-related impacts at or near the Project Site. In addition, best practices with regards to the storage of construction-related materials, including those that minimize the potential for spills and accidental discharges into wetlands and waterbodies, will be implemented.

STORMWATER MANAGEMENT

All new development will involve construction of stormwater management features. Runoff from construction sites will be managed through the implementation of erosion and sediment controls and, if possible using green infrastructure techniques such infiltration practices and porous pavement. All construction activities would also be required to adhere to erosion and sediment controls as set forth below.

EROSION AND SEDIMENT CONTROL

Potential impacts associated with construction of the components of the Proposed Project include sediment deposition, erosion, and turbidity within receiving water bodies. To address these potential impacts, Erosion and Sediment Control Plans will be developed in accordance with the New York Standards and Specifications for Erosion and Sediment Controls, with SPDES General Permit GP-0-10-001 and New York State Stormwater Management Design Manual (NYSSMDM), and with City of Saratoga Springs Code Chapter 242: Stormwater Management.

It is anticipated that the following standard erosion control practices will be implemented to minimize the potential impacts associated with future site disturbance (clearing, excavation):

- Protect vegetation
- Stabilize construction entrance/exit
- Silt fence
- Stone check dams
- Storm drain inlet protection
- Material stockpile protection
- Gravel surface construction area

- Stone outlet sediment trap
- Dust control
- Temporary stabilization (such as rolled erosion control blankets, seeding, and mulching or soil stabilizers)
- Sump pit
- Dewatering
- Perimeter dike/swale
- Temporary sediment basin
- Materials handling precautions

Inspection and Maintenance

Inspection and maintenance of the proposed stormwater management features will be conducted to ensure that the erosion and sediment control practices that are part of the Stormwater Pollution Prevention Plan (SWPPP) continue to be effective in preventing sediment and other pollutants from entering the stormwater system. As a part of the SWPPP inspection and maintenance activities during construction, an Erosion and Sediment Control Inspection Report will be prepared and maintained on-site.

Inspections will be conducted by a qualified inspector once every seven days, according to the schedule required by the SPDES GP 0-15-002. During each inspection, the qualified inspector will record the areas of disturbance, deficiencies in erosion and sediment control practices, required maintenance, and areas of temporary or permanent stabilization. The need for modifications to the Erosion and Sediment Control Plan will be identified and implemented.

Maintenance will be completed in accordance with the New York State Standards and Specifications for Erosion and Sediment Control.

WATER SUPPLY

While the Proposed Project would use water during construction activities (wash-down, potable water for workers, etc.) the construction activities would take place only outside of the racing season. Therefore, the incremental demand from construction activity occurs when on-site water demand is greatly reduced as is overall usage throughout the City's water supply system and no impacts on water supply would be expected from construction activities.

SANITARY SEWER

Construction activities would generate marginal additional sanitary flows from the Project Site from the additional daily population of construction workers. Construction activities would take place during the off-season when on-site sanitary flows are greatly reduced and no impacts on water supply would be expected from construction activities.

ENERGY

While the Proposed Project would draw energy demand during construction (lighting, power tools, etc.) this demand would take place during the off-season when overall utilization is already reduced from peak summer conditions. No significant adverse impacts on energy would be expected from construction activities.

TRANSPORTATION

Construction of the Proposed Project would create daily construction-related traffic to and from the Project Site, including vehicle trips related to workers and delivery of materials and equipment. Parking for construction workers at the site will be accommodated on site and would not utilize local streets. In addition, there would be some truck traffic associated with removal of construction debris, demolished structures, and potentially from excavated materials from the Project Site.

NYS Route 9P is a two-way roadway which generally travels in an east-west direction in the study area. NYS Route 9P is designated as Union Avenue within the study area. Union Avenue generally provides two moving lanes in each direction and provides a striped median west of Nelson Avenue and a grass median east of Nelson Avenue. Union Avenue (west of East Avenue) is under the jurisdiction of the City of Saratoga Springs while the Union Avenue segment of NYS Route 9P east of East Avenue is under the jurisdiction of NYSDOT.

Construction-related vehicles would be instructed to take Exit 14 off Interstate 87 and travel west on Union Avenue into the Project Site. The number and type of vehicles would vary depending on the exact work being done at the Project Site. During land clearing, grading, and excavation, the primary construction activities would be limited to that specific equipment (which would remain on-site during the land preparation phase). Building construction typically requires the greatest number of workers and generates more vehicle trips than other phases of development. However, construction-related peak traffic hours for the morning and evening are typically from 6:30 AM to 7:30 AM (prior to the start of the 7:30 AM shift) or from 10:00 AM to 11:00 AM (prior to the 11:00 AM shift) and 6:00 PM to 7:00 PM (following the end of the construction shift at 6:00 PM), respectively and based on the City of Saratoga Noise Code limiting hours of construction. As such, construction traffic would avoid significant conflicts with commuter peak hours, which are typically between 8:00 AM to 9:00 AM and 5:00 PM to 6:00 PM.

A maintenance and protection of traffic plan would be in place to minimize impacts on local traffic. Measures would include clear signage, detours, and flagmen, as necessary. All construction vehicles and staging are expected to be accommodated on site, thereby limiting any queuing on public streets. In addition, Work Zone Traffic Control Plans (WZTCP) would be developed as necessary and approved by the City and NYSDOT for any construction performed on its roads. Finally, local roads that carry construction vehicles and other local traffic will be swept or washed down as needed as determined by the City and NYSDOT as established by the SWPPP and the Construction Manager.

With this management plan in place, construction activities would not be expected to adversely impact existing and future traffic conditions in the study area.

AIR QUALITY

Emissions from on-site construction equipment and on-road construction-related vehicles, as well as dust generating construction activities, have the potential to affect air quality. It is anticipated that the periods of heaviest construction would be limited to approximately two to three months of the year. During this time, construction activities may include the use of excavators/dozers, backhoes, cranes, graders/rollers, dump trucks, concrete pumps and trucks. However, the nearest sensitive receptor locations are located more than 75 to 250 feet away from the Project Site and would likely be even further since most of the construction activities would

take place in the interior of the Project Site. Such distances between the emissions sources and these sensitive locations would result in enhanced dispersion of pollutants; therefore, potential concentration increments from on-site construction sources at such locations would be minimized. In addition, all construction equipment would be properly maintained, to reduce unnecessary emissions. Dust control measures would be implemented where necessary to avoid the re-suspension of dust during construction. For example, water sprays would be used to ensure that materials are dampened as necessary to avoid the suspension of dust into the air and all trucks hauling loose material would be equipped with tight-fitting tailgates and their loads securely covered prior to leaving the construction site. Measures would be taken to reduce pollutant emissions during construction in accordance with all applicable laws, regulations, and codes. Therefore, based on the information presented above, the proposed project would not result in any significant adverse construction air quality impacts.

NOISE

It is anticipated that the periods of heaviest construction that could affect outdoor noise levels would occur for about two to three months of the year. During this time, construction activities could include the use of excavators/dozers, backhoes, cranes, graders/rollers, dump trucks, concrete pumps and trucks either idling or use. While these equipment will be equipped with factory-installed mufflers that will be maintained in good condition, these construction activities may still be loud and noticeable at the site's property line, the nearest sensitive receptors are located at minimum distances of 75 to 250 feet (and for the majority of construction activities would be even further located in the interior of the Project Site). At these distances, construction noise levels would be 4 to 14 dBA lower than at the property line due to attenuation with distance from the source. Since construction noise sources typically produce noise levels in the mid 70s to mid 80s dBA, construction noise levels at the receptors would be comparable or less than existing noise levels and below the NYSDEC impact criteria. Additionally, the hours of construction would adhere to the time limits specified in the City of Saratoga Springs Noise Control Law, which permit construction only between 7:30 AM and 6:00 PM on weekdays and 9:00 AM and 5:00 PM on Saturdays. Consequently, it can be concluded that the construction of the proposed project would not result in any significant adverse noise impacts.

ECONOMIC CONDITIONS

As estimated in Chapter 14: Economic Conditions, the expenditure of approximately $15.0 million in direct expenditures each year would generate a direct employment demand of about 84 person-years of employment.[1] Since this annual expenditure would occur over a 10-month construction season, it is estimated that on average there could be about 100 construction-related workers on-site. This new level of economic activity can also be expected to generate demand an additional 16 person-years of indirect employment and 33 person-years of induced employment within the Capital Region, bringing the total number of jobs from construction to 133 person-years. Over the approximately 9-year period, the proposed project would generate 1,338 direct, indirect, and induced person-years of employment. Based on 2013 Quarterly Census of Employment and Wages data, there are 4,903 workers in the construction of buildings sector and 12,591 specialty trade contractors in the Capital Region. As the current supply of construction workers in the region far exceeds the number of workers that would be on-site each year, it is likely that construction of the proposed project would not result in pressure on the construction labor market.

[1] A person-year is the equivalent of one person working full-time for a year.

CULTURAL RESOURCES

HISTORIC RESOURCES

Since construction activities are wholly located on the Project Site, they are not expected to adversely impact historic resources located within the Area of Potential Effect (APE) but outside of the Project Site itself.

Construction activities will be undertaken on or adjacent to structures that are considered contributing resources to the State/National Register of Historic Places-listed Historic District of which the Race Course is a part. As detailed in Chapter 15: Cultural Resources, NYRA has committed to enter into a LOR with the OPRHP that will include provisions for a Construction Protection Plan (CPP) to ensure that any construction activities in the immediate proximity of contributing resources do not inadvertently damage such resources. The CPP would set forth specific measures to be used and specifications that would be applied to protect these historic resources during the construction period.

ARCHEOLOGICAL RESOURCES

As summarized in **Table 18-1**, anticipated construction activities could occur within 11 areas identified as sensitive for historic-period archaeological. [1] 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.

Table 18-1
Archaeological Sensitivity by Areas of Construction Activity

Sensitivity Area ID	Subarea Location	Period	Level	Potential Project Impacts
1	Backstretch/ Outside APE	Historic	Low to moderate	Proposed new building on Backstretch
2	Superintendents Residence	Historic	Moderate	Improvements to Superintendent's Residence Rear Yard
3	Madden Court	Historic	Moderate	Proposed new building in Madden Court
4	Madden Court	Historic	Moderate	Proposed new buildings in Madden Court
5	Autopark Area	Historic	Moderate	New Lincoln Avenue Gate
6	Union Avenue & Backyard East	Historic	Moderate	Picnic Area
7	Clark's Cottage	Historic	Moderate	Nelson Avenue Service Building
8	Wright Street Entrance/ Paddock & Saddling Area	Historic	Moderate	Nelson Avenue Service Building; Wright Street Gate Modifications; New Jockey House; Paddock Modifications
9	Wright Street Entrance	Historic	Moderate	Nelson Avenue Service Building; At-the-Rail Building; Wright Street Gate Modifications
10	Madden Court	Historic	Moderate	Proposed new buildings in Madden Court
Sources:	*See Figure 15-28 for Reference			

[1] For other areas of the Project Site identified as possessing low sensitivity for archaeological resources, no further archaeological investigation or consultation is considered necessary prior to undertaking ground-disturbing activities. In addition, there is one area of the Project Site identified as possessing precontact period archaeological sensitivity but there are no anticipated construction activities associated with the Proposed Project.

HAZARDOUS MATERIALS

All construction activities would be undertaken using the following protocol:

- Soil and groundwater beneath the Property may have been affected by past and present, on- and off-site uses and from spills previously reported at the Saratoga Race Course. Therefore, pre-construction activities would include a subsurface investigation involving collection and laboratory analysis of subsurface (soil and groundwater) samples. The focus of the subsurface investigation within the Frontside would be in the vicinity of the pesticide/herbicide storage areas, the workshop areas, the maintenance building, and the generator room. The focus of the subsurface investigation within the Backstretch would be in Horse Haven immediately south of the Oklahoma Training Track in the vicinity of the site's maintenance facilities including the garage, carpenter's shop, blacksmith, and paint storage area, and numerous sheds.
- All containers of chemicals, antifreeze, diesel fuel, pesticides, herbicides and solvents not being used should be properly tested, labeled and disposed of at appropriate receiving facilities in accordance with federal, state and local requirements.
- Due to historic pesticide, herbicide, and fungicide use, any soil that is generated and intended to be disposed off-site should be characterized and disposed of in accordance with applicable federal, state, and local requirements.
- A CHASP would be prepared and implemented to manage disturbance of soil and a contingency plan to address sources or areas of contamination, if any, encountered during future construction activities. Elements of the CHASP will include the following:
    - Sampling of excavated soil generated during redevelopment would be performed if it is intended to be placed as shallow soil (within the top 2 feet) and not covered by a building or paved surface.
    - All soil and fill excavated as part of Project Site development activities would be managed in accordance with all applicable regulations. All soil intended for off-Site disposal would be tested in accordance with the requirements of the intended receiving facility. Transportation of all material leaving the Project Site for off-Site disposal would be in accordance with federal, state and local requirements covering licensing of haulers and trucks, placarding, truck routes, manifesting, etc. If dewatering is required for construction, it would be conducted in accordance with all applicable regulations. Pre-treatment of groundwater prior to discharge would be completed during any dewatering activities, if necessary.
    - If tanks, drums, or other sources of subsurface contamination are discovered at the Property during excavation activities, they would be removed in accordance with all applicable regulations. Any associated soil and groundwater contamination would be mitigated in accordance with the state, county, and local requirements.
- Appropriate erosion and sediment controls would be implemented in accordance with the project SWPPP. This would minimize the potential of dust generation and sediment in stormwater during the soil disturbance activities.
- Prior to any construction or demolition activities, any suspected asbestos-containing materials or lead-based paint in the on-site structures that could be disturbed based on project work proposed would be properly removed and disposed of in accordance with all federal, state, and local regulations, prior to the start of work.

- All lighting fixtures and electrical equipment, including any fixtures containing PCB's, would be disposed of in accordance with applicable federal, state and local requirements.

With the implementation of these measures, no significant adverse impacts related to hazardous materials would be expected to occur as a result of the construction activities for the Proposed Project. Following construction of the Proposed Project, there would be no further potential for adverse impacts.

E. MITIGATION

With implementation of the measures identified above, construction activities on the Project Site are not expected to generate additional adverse impacts and no further mitigation measures are required. ✷