

**A. INTRODUCTION**

The SEQRA and its implementing regulations require the consideration of project alternatives, which are formulated to avoid or minimize identified potential impacts of the Proposed Project. SEQRA requires analysis of a “No Action” alternative and, as applicable, consideration of a “reasonable range of design and use alternatives” for comparison to the Proposed Project. The alternatives analyzed in this chapter are designated as either a “No Action” alternative (i.e., the Project Site would continue to be used as a Race Course and none of the project elements identified as part of the Proposed Project would be implemented) or “Reduced Scope Alternatives,” which reduce the scale of certain elements of the Proposed Project resulting in fewer potential impacts.

As noted in Chapter 1, “Project Description,” the Proposed Project represents a comprehensive range of elements that is anticipated to be built out over the next decade. The actual completion of any specific plan element will be based on the availability of capital improvement funding and strategic planning factors that could change over time. Therefore, the Reduced Scope Alternatives assume a reduction in the scope of the Proposed Project that would still be consistent with NYRA’s overall goals for the Race Course, but could also result in a reduction of environmental impacts. Since many of the project elements are dependent on or linked to the implementation of other elements, removal or modification to one element can affect the feasibility of other elements.

The Project Alternatives discussed in this chapter are listed below and were identified through the master planning process undertaken as part of the Proposed Project. These alternatives include the No Action Alternative as well as four reduced size alternatives which would be the most likely alternatives to be implemented if the scope is reduced.

**NO ACTION**

- Alternative 1: No Action (Future Without the Proposed Action)

**REDUCED SCOPE ALTERNATIVES**

- Alternative 2: No changes to existing Jockey House or Administration Building
- Alternative 3: No Relocation of Racing Office from Saddling Shed
- Alternative 4: No Backyard Expansion
- Alternative 5: Reduced Size of Nelson Avenue Service Building

Potential environmental impacts from each of these alternatives have been qualitatively assessed to a level of detail sufficient to allow reasonable comparison with the Proposed Project. Each of the subject areas analyzed in this DGEIS has been analyzed for these alternatives. Using conclusions from the preceding chapters, the potential impacts of each alternative are compared

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to the potential impacts of the Proposed Project. A summary of the comparative impacts for all of the “Reduced Scope Alternatives” is presented in **Table 19-1**. It is important to note that any of these alternatives could be selected individually or together.

### **PRINCIPAL CONCLUSIONS**

The “No Action Alternative” would not achieve NYRA’s objectives, and would not result in a multi-year reinvestment to both the Frontside and Backstretch of the historic Saratoga Race Course. The Reduced Scope Alternatives (Alternatives 2 to 5) would provide varying degrees of loss of some programing and space efficiencies but would still be consistent with NYRA’s overall goals for the Race Course and its vision for the future.

**Table 19-1  
Comparison of Reduced Scope Project Alternatives**

	<b>Proposed Project</b>	<b>No Action Alternative</b>	<b>Alt. 2: No Changes to Existing Jockey House and Admin Building</b>	<b>Alt. 3: No Relocation of Racing Office from Saddling Shed</b>	<b>Alt. 4: No Backyard Expansion</b>	<b>Alt. 5: Reduced Size of Nelson Ave. Service Building</b>
<b>Purpose and Need</b>	Retain and lengthen the stay of existing patrons; sustain and attract visitors into the future; 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; and, improve the efficiency and quality of Race Course operations.	Under the No Action Alternative there would be no comprehensive reinvestment strategy for the Race Course and the stated purpose and need of the Proposed Project would not be achieved..	This alternative would result in some cost savings compared to the Proposed Project, but would still be consistent with the overall purpose and need. Reduces the ability of the site to improve space efficiencies in useable areas for customers.	This alternative would result in some cost savings compared to the Proposed Project, but would still be consistent with the overall purpose and need. Reduces the ability of the site to improve space efficiencies in useable areas for customers.	This alternative would result in some cost savings compared to the Proposed Project, but would still be consistent with the overall purpose and need. Reduces the ability of the site to improve space efficiencies in useable areas for customers.	This alternative would result in some cost savings compared to the Proposed Project, but would still be consistent with the overall purpose and need. Reduces the ability of the site to improve space efficiencies in useable areas for customers.
<b>Land Use, Zoning, Community Character and Public Policy</b>	Consistent with land uses on the Project Site and within Study Area. No adverse impacts	No comprehensive change or reinvestment in Race Course	Same as Proposed Project	Same as Proposed Project.	Same as Proposed Project	Same as Proposed Project
<b>Community Services and Facilities</b>	No significant increase in demand for emergency services Improvements to vehicle and pedestrian safety and circulation.	No comprehensive improvement to vehicle and pedestrian safety and circulation	Same as Proposed Project	Same as Proposed Project.	Same as Proposed Project	Same as Proposed Project
<b>Geology, Soils and Topography</b>	No proposed structures in regions of the site containing slopes greater than 15 percent No effects on springs and groundwater at or near Race Course	No change	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project
<b>Natural Resources</b>	Conversion of mowed lawn to building coverage would be approximately one acre	No conversion of mowed lawn area	Less conversion of mowed lawn	Less conversion of mowed lawn	Less conversion of mowed lawn.	Less conversion of mowed lawn.
<b>Surface Water Resources and Wetlands</b>	No disturbance to wetlands or watercourses.	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project
<b>Stormwater Management</b>	No increase in Frontside stormwater runoff is expected. Net increase of approximately 86,523 sf of impervious cover in Backstretch	No change in stormwater runoff	Less site disturbance and slight decrease in Frontside impervious cover.	Less site disturbance and slight decrease in Frontside impervious cover	Less site disturbance and slight decrease in Frontside impervious cover	Less site disturbance and slight decrease in Frontside impervious cover
<b>Water Supply</b>	Increase demand of 53,240 gpd	No change	Slightly lower average daily demand.	Slightly lower average daily demand.	Slightly lower average daily demand.	Slightly lower average daily demand.
<b>Sanitary Sewer</b>	Increase sanitary flow of 53,240 gpd	No change	Slightly lower increase in sanitary flow.	Slightly lower increase in sanitary flow.	Slightly lower increase in sanitary flow.	Slightly lower increase in sanitary flow.
<b>Energy and Telecommunications</b>	Increase energy demand of 3,020,160 kWh annually.	No change	Slightly lower increase in energy demand.	Slightly lower increase in energy demand.	Slightly lower increase in energy demand.	Slightly lower increase in energy demand.
<b>Traffic and Transportation</b>	114 new trips weekday Midday peak hour. 98 new trips weekday PM peak hour. 80 new trips Saturday Midday peak hour. 84 new trips Saturday PM peak hour. Displacement and relocation of parking from the Auto-Park area of the Frontside to the Lowlands or other areas used for parking during the racing season	No change	Fewer pedestrian and horse circulation improvements in the Paddock.	Fewer pedestrian and horse circulation improvements in the Paddock.	No displacement of parking from the Autopark.	Same as Proposed Project
<b>Air Quality</b>	No mobile or stationary source impacts.	No change	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project
<b>Noise</b>	No significant adverse noise impacts.	No change	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project
<b>Economic Conditions</b>	Expenditure of approximately \$15 million per year over next decade. Increased revenues due to modest increases in attendance, additional amenities and retail, and new food and beverage sales	No increase in capital expenditures	Marginally lower development costs. Slightly less revenue due to scaled back Project elements	Marginally lower development costs. Slightly less revenue due to scaled back Project elements	Marginally lower development costs. Slightly less revenue due to scaled back Project elements	Marginally lower development costs. Slightly less revenue due to scaled back Project elements
<b>Cultural Resources</b>	Assuming compliance with LOR, no adverse impacts to historic resources would result.	No LOR, any future projects would require individual review and determination.	Compared to Proposed Project, no new Jockey House and no changes to existing paddock area would retain existing historic character in this sub area. Overall, substantially similar to proposed project, no adverse impacts based on compliance with LOR	Compared to Proposed Project, no new Jockey House and no changes to existing paddock area would retain existing historic character in this sub area. Retaining racing offices within the Saddling Shed would not realize the benefit of restoring the historic "open air" character. However, like proposed project, no overall adverse impacts based on compliance with LOR	Elimination of the backyard enhancements would leave the existing Autopark intact. The Autopark is considered a character-defining feature of the historic landscape of the Race Course. Like proposed project, no overall adverse impacts based on compliance with LOR	Smaller Nelson Avenue building requires implementation of Alternatives 2 and 3 or other decisions regarding re-use or relocation of uses within other structures. Like proposed project, no overall adverse impacts based on compliance with LOR
<b>Visual Resources</b>	Minor visual changes from public roadways including: Nelson Avenue, Caroline Street, Lincoln Avenue, and East Avenue. No significant adverse impacts to visual resources.	No change	Nelson Avenue Service Building would be smaller. Similar visibility from Caroline Street, Lincoln Avenue, and East Avenue. No significant impacts to visual resources.	Nelson Avenue Service Building would appear smaller. Similar visibility from Caroline Street, Lincoln Avenue, and East Avenue. No significant impacts to visual resources.	Nelson Avenue Service Building would appear smaller. Similar visibility from Caroline Street, Lincoln Avenue, and East Avenue. Retain existing view character from Union Avenue No significant impacts to visual resources.	Nelson Avenue Service Building would appear smaller. Similar visibility from Caroline Street, Lincoln Avenue, and East Avenue. No significant impacts to visual resources.
<b>Hazardous Materials</b>	No hazardous materials impacts based on pre-construction due diligence activities.	No change, any future disturbance would require individual site evaluation.	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project	Same as Proposed Project
<b>Construction</b>	9-year build-out managed through Construction Management Plan. No significant adverse impacts	No change	Fewer project elements and slightly less construction activity. No significant adverse impacts.	Fewer project elements and slightly less construction activity. No significant adverse impacts.	Fewer project elements and slightly less construction activity. No significant adverse impacts.	Fewer project elements and slightly less construction activity. No significant adverse impacts.

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## **B. ALTERNATIVES TO THE PROPOSED PROJECT**

### **NO ACTION**

#### *ALTERNATIVE 1: NO ACTION*

Alternative 1 assumes that the Project Site would continue to be used as a Race Course and none of the project elements identified as part of the Proposed Project would be implemented. Although none of the project elements identified as part of the Proposed Project would be developed, it is assumed that the projects identified in Chapter 1, “Project Description” as Background Projects could still be implemented. Under Alternative 1, NYRA’s goals of modernizing and revitalizing Race Course facilities to sustain and attract visitors and to lengthen the stay of existing patrons would not be realized. In addition, the proposed improvements focused on enhancing operational efficiencies that benefit the racing participants such as the construction of the three new boarding stables, one holding stable, and six new dormitories would not occur.

The Applicant would continue to maintain the Race Course facilities, but would not make any substantial capital investments or upgrades to either the facilities or their associated infrastructure. With the No Action Alternative, no changes to the subject areas analyzed in the DGEIS would be expected. However, the No Action Alternative would also not result in the overall improvements to Race Course facilities expected as a result of the Proposed Project. The No Action Alternative would also eliminate the potential for the significant project-generated revenues expected to result from the broader spectrum of service choices and offerings for guests and the operational efficiencies that benefit racing participants. Without the Proposed Project, modernization of site facilities and restoration and reprogramming of some of the site’s historic structures as well as improvements to vehicle and pedestrian circulation would not be realized. Any new substantial project undertaken in the future would require individual application and reviews before OGS and SHPO or other regulatory agencies. The No Action Alternative would not achieve NYRA’s objectives, and would not result in a multi-year reinvestment of both the Frontside and Backstretch of the historic Saratoga Race Course.

### **REDUCED SCOPE ALTERNATIVES**

The Proposed Project is a comprehensive plan that provides a road map for the long term implementation of projects on both the Frontside and Backstretch areas of the Race Course. These projects include the renovation and restoration of historic elements, new amenities and facilities that complement the existing facility by offering new and improved amenities to the customer, and, finally, reinvestment in the critical infrastructure to enhance the quality and efficiency of the Race Course. In consideration of moving the Proposed Project forward with elements that could be reduced in scale and scope, these Reduced Scope Alternatives present several opportunities identified in the master planning process to provide implementation options that reduce the amount of new construction. They could be considered in any combination as variations on the overall Proposed Project.

*ALTERNATIVE 2: EXISTING JOCKEY HOUSE AND ADMINISTRATION BUILDINGS  
WOULD REMAIN THE SAME*

Alternative 2 assumes no changes to the existing Jockey House and administration buildings. The Jockey House and administration buildings are a cluster of three historic buildings located within the Paddock and Saddling Area (see Figure 1-33). As part of the Proposed Project, the jockey uses will be moved from the existing Jockey House to a New Jockey House and the existing Jockey House will be reprogrammed to house administrative offices, reserved guest seating, guest services offices and a new NYRA retail store and café (see Figure 1-34).

Under Alternative 2, the 14,356 square foot New Jockey House would not be constructed and the jockey facilities and administration uses would be maintained within existing buildings. Since the administrative office space would be maintained in the current location, the proposed administrative space in the Nelson Avenue Service Building would be scaled back and the building would be smaller in size. No Paddock modifications would be proposed since the New Jockey House renovations were an integral element of the Paddock Modifications and were proposed in part to increase guest viewing of the jockeys and horses before the races.

This alternative assumes that the Saddling Shed modifications will be pursued without the New Jockey House. Therefore, as part of Alternative 2, a smaller, single-story racing office is proposed to be located behind the existing saddling stalls adjacent to Frank Sullivan Place (but within the Race Course grounds such that it would not front on the public street). The new racing offices would be constructed to allow for the historic renovations and reprogramming of the Saddling Shed. As discussed in Chapter 15, “Cultural Resources,” any proposed renovations or modifications to existing historic buildings would be required to comply with the LOR which outlines a process for avoiding, minimizing, or mitigating impacts to historic resources.

It is expected that this Alternative would not achieve all of the potential benefits of the Proposed Project, since it is expected that this Alternative would reduce administrative space efficiencies and limit the ability of NYRA to create efficient and useable areas for customers. In addition, the proposed new NYRA guest services and retail space intended within the New Jockey House and administrative buildings would not be developed and the plan to provide high-end retail services not currently available at the Race Course in these locations would not be realized. However, this alternative would still result in improvements to the overall visitor experience through space efficiencies realized by the construction of the Nelson Avenue Service Building as well as the historic renovations and reprogramming of the Saddling Shed.

Using conclusions from the preceding chapters, the potential impacts of Alternative 2 were compared to the potential impacts of the Proposed Project. Alternative 2 would be expected to have similar types of environmental impacts for each subject area analyzed in the DGEIS with the exception of the following subject areas:

*Geology, Soils, and Topography*

Alternative 2 would result in slightly less grading and disturbance to soils. Similar to the Proposed Project, Alternative 2 would not be expected to result in significant adverse impacts to Geology, Soils, and Topography

*Natural Resources*

Alternative 2 would result in slightly less conversion of mowed lawn than the Proposed Project. Similar to the Proposed Project, Alternative 2 would not be expected to result in significant adverse impacts to Natural Resources.

*Stormwater Management*

Alternative 2 would be expected to result in slightly less impervious surface than the Proposed Project. Stormwater runoff would continue to be managed in an on-site stormwater management system. Similar to the Proposed Project, Alternative 2 would not be expected to result in adverse stormwater management impacts.

*Cultural Resources*

Overall, like the Proposed Project, Alternative 2 is expected to have a positive impact on the historic character of the Race Course. The elimination of the new Jockey House and rebuilt paddock area would leave the existing historic character of this area of the Race Course intact with no introduction of new landscape or building features. This alternative would retain the proposed renovation to the historic Saddling Shed and the construction of single-story racing offices within the historic Paddock area.

As part of the array of planned elements and conceptual improvements, any proposed renovations or modifications to existing historic buildings or character defining landscape features would be required to comply with the LOR as described in Chapter 15, "Cultural Resources." The LOR outlines a process for avoiding, minimizing, or mitigating impacts to character-defining landscape features. Provided compliance with the LOR, the proposed project's impacts on the overall historic landscape of the Race Course are not expected to be adverse.

***ALTERNATIVE 3: NO RELOCATION OF RACING OFFICES FROM SADDLING SHED***

Alternative 3 assumes that along with the elimination of the new Jockey House, existing racing offices would not be relocated from the Saddling Shed to the New Jockey House and no new single-story racing offices would be constructed. Under the Proposed Project, one of the goals of the Saddling Shed Modifications is to remove non-historic elements and uses 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 (see Figures 1-25 to 1-27). Without the relocation of the racing offices, the Saddling Shed would not be returned to an open air pavilion and the goal of removing non-historic elements and uses from the structure would not be achieved. In addition, no Paddock Modifications would occur under this alternative.

This alternative assumes that the Saddling Shed structure would still be refurbished but would maintain its current function and uses. The refurbishment would likely occur as part of the ongoing capital investment in the current facilities (Frontside and Backstretch). As discussed in Chapter 15, "Cultural Resources," any proposed renovations or modifications to existing historic buildings would be required to comply with the LOR, which outlines a process for avoiding, minimizing, or mitigating impacts to historic resources.

It is expected that this Alternative would not achieve all of the potential benefits of the Proposed Project, since it is expected that this Alternative would reduce administrative space efficiencies and limit the ability of NYRA to create efficient and useable areas for customers. However, it

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would still result in improvements to the overall visitor experience through space efficiencies realized by the construction of the Nelson Avenue Service Building as well as refurbishments to the Saddling Shed.

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

### *Natural Resources*

Alternative 3 would result in slightly less conversion of mowed lawn than the Proposed Project. Similar to the Proposed Project, Alternative 3 would not be expected to result in adverse impacts to Natural Resources.

### *Stormwater Management*

Alternative 3 would be expected to result in slightly less impervious surface than the Proposed Project. Stormwater runoff would continue to be managed in an on-site stormwater management system. Similar to the Proposed Project, Alternative 3 would not be expected to result in adverse stormwater management impacts.

### *Cultural Resources*

Overall, Alternative 3 is expected to have a neutral impact on the historic character of the Race Course, although the positive benefits associated with the reprogramming of the Saddling Shed would not be realized. However, it is assumed that renovations to the structure of the historic Saddling Shed would still occur. Any proposed renovations or modifications to existing historic buildings would be required to comply with the LOR as described in Chapter 15, "Cultural Resources." The LOR outlines a process for avoiding, minimizing, or mitigating impacts to historic resources. Similar to the Proposed Project, provided compliance with the LOR, Alternative 4 would not be expected to result in adverse impacts to cultural resources.

### *Visual Resources*

Under Alternative 3, the positive benefits to the visual character of the Saddling Shed associated with the removal of the racing offices would not occur. However, it is assumed that renovations to the structure of the historic Saddling Shed would still occur. Similar to the Proposed Project, Alternative 3 would not be expected to result in adverse impacts to visual resources.

## **ALTERNATIVE 4: REDUCTION IN SCOPE OF BACKYARD EXPANSION**

Alternative 4 would result in a reduction in the scope of Backyard Expansion. Under the Proposed Project, the modifications to the Backyard would allow existing Backyard activities and venues to expand north into the Autopark Area, which has been identified as a character defining feature of the Race Course's historic landscape. The modifications would include a number of renovation and landscape projects resulting in a reorganization of the Backyard facilities, improved seating areas, enhanced food offerings, and better organized retail spaces as well as more organized mutuels and video/TV areas. These improvements are expected to enhance the overall appearance of the site and establish a more cohesive entertainment experience for guests. Alternative 4 assumes the Backyard would not be extended into the Autopark Area. As a result, a number of the proposed renovation and landscape projects would

not be implemented and this alternative would avoid any potential for impacts to the historic character of the Autopark landscape.

This cost saving alternative would not result in the expected visual benefits to the appearance, cohesiveness, and entertainment functions of the Backyard Area including the Picnic Area. It would reduce the potential to create a more interconnected area that encompasses improved seating, additional food offerings, well organized retail spaces, and better organized betting and video/TV areas (see Figure 1-42). Although overall project costs would decrease under this alternative, this alternative would reduce the ability of the site to improve space efficiencies in useable areas for customers. However, this reduced scope would not be expected to negatively affect a visitor's overall experience at the Race Course. Further, this alternative would not require the relocation of parking from the Autopark Area to other areas of the Race Course and would retain the existing view character of the site from Union Avenue.

Using conclusions from the preceding chapters, the potential impacts of Alternative 4 were compared to the potential impacts of the Proposed Project. Alternative 4 would be expected to have similar types of environmental impacts for each subject area analyzed in the DGEIS with the exception of the following subject areas:

*Traffic and Transportation*

This alternative would not require the relocation of parking from the Autopark Area to other areas of the Race Course. Similar to the Proposed Project, Alternative 4 would not be expected to result in adverse impacts to traffic or transportation.

*Cultural Resources*

Under Alternative 4, the Backyard would not be extended into the Autopark Area. Unlike the Proposed Project, this alternative would retain the Autopark which is considered a character-defining feature of the historic landscape of the Race Course.

*Visual Resources*

Under Alternative 4, the expected visual benefits to the appearance, cohesiveness, and entertainment functions of the Backyard Area including the Picnic Area and the proposed landscape and visual improvements to the Autopark Area would not be realized. However, this alternative would not require the relocation of parking from the Autopark Area to other areas of the Race Course and would maintain the character defining landscape features of this area. Unlike the Proposed Project, the existing view character of the site from Union Avenue would not be altered.

***ALTERNATIVE 5: REDUCTION IN SIZE OF NELSON AVENUE SERVICE BUILDING***

Under Alternative 5, the height and bulk of the Nelson Avenue Service Building could be reduced to achieve cost savings. As one of the few new buildings proposed to be built along the edge of the Race Course Property, this building would be visible from Nelson Avenue. This alternative considers how a scaled-back version of the Nelson Avenue Service Building would affect the programming of the other the project elements and the overall visitor experience. It should be noted that the need for space in the Nelson Avenue Service Building decreases with the elimination of other elements of the Proposed Project (including Alternatives 2 and 3, above). However, this also lessens the overall flexibility of the Proposed Project to maximize space efficiencies and useable areas for customer amenities and services.

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Under the Proposed Project, the Nelson Avenue Service Building will house the site's central receiving, administrative offices, and a new production kitchen (see Figure 1-6 to 1-8). The new building will provide more space and upgraded facilities and centralize many operational functions to improve site efficiency (i.e., the production kitchen would alleviate kitchen and storage needs at the existing food service venues throughout the Frontside, particularly in the Grandstand Complex). The smaller Nelson Avenue Service Building Alternative would restrict the ability to centralize administrative uses, to create efficiencies for kitchen services, to provide a centralized loading/unloading area, to reduce guest conflicts, to centralize kitchen functions, and to provide support for the At-the-Rail-Building.

Therefore, with this alternative, certain aspects of the overall Proposed Project would require reformulation to achieve the goal of improving customer amenities and attaining operational efficiencies while leaving administration and service areas in their existing locations. Such a balance could be struck by implementing Alternatives 2 or 3 as described above to eliminate the need for the transfer of office space to the proposed Nelson Avenue Service Building, or by making other refinements to the overall building program to achieve the same results. Most notably, less space would be required in the Nelson Avenue Service Building if the Clubhouse/Grandstand modifications were scaled back.

Overall, even with these modifications, a reduced Nelson Avenue service building would remain consistent with the overall goals of the Proposed Project and allow NYRA to meet its Purpose and Need for the Proposed Project. Using conclusions from the preceding chapters, the potential impacts of Alternative 5 were compared to the potential impacts of the Proposed Project. Alternative 5 would be expected to have similar types of environmental impacts for each subject area analyzed in the DGEIS with the exception of the following subject areas:

### *Cultural Resources*

Under Alternative 5, the footprint and/or bulk of the Nelson Avenue Service building would be reduced. Compared to the Proposed Project, this alternative may avoid potential disturbance to areas of archeological sensitivity due to the decrease in the size of the building footprint.

### *Visual Resources*

Under Alternative 5, the size of the Nelson Avenue Service Building would be reduced and the building footprint would be smaller than the Proposed Project. As one of the few new buildings proposed to be built along the edge of the Race Course Property, this building would still be visible from Nelson Avenue and would not be expected to have a significantly different appearance from the Proposed Project. Similar to the Proposed Project, Alternative 5 would not be expected to result in significant adverse impacts to visual resources. \*