A. INTRODUCTION AND METHODOLOGY

This chapter describes the natural resource characteristics of the Project Site and the potential impacts to those resources from the development of the Proposed Project. Existing conditions for vegetation, wildlife, and threatened, endangered, and special concern species were obtained from the following sources:

- Site Inspection by an AKRF ecologist conducted in November 2013 to inspect habitat types and onsite wetlands.
- Saratoga Race Course Tree Risk Assessment, Urban Forest Analytics, May 2012.
- Published information identified in literature and obtained from governmental and nongovernmental sources, including the New York State Department of Environmental Conservation (NYSDEC) Environmental Resource Mapper; U.S. Fish and Wildlife Service (USFWS) list of threatened, endangered and candidate species; 2000-2005 New York State Breeding Bird Atlas; NYSDEC Herp Atlas Project.
- Responses from the New York Natural Heritage Program (NYNHP) to a request for information on rare, threatened, or endangered species recorded in the vicinity of the Project Site. (See **Appendix C**)
- Consideration of additional un-listed (not threatened or endangered) species with the potential to occur within the Project Site on the basis of their range within New York, habitat associations, area requirements, and commonness in the region.

Impacts from construction and operation of the Proposed Project to vegetation and wildlife were assessed by considering land clearing, permanent habitat loss, and noise disturbances.

PRINCIPAL CONCLUSIONS

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

replacement of existing over-mature or damaged/diseased shade trees on the Project Site would be conducted in the coming years—and has been the subject of a comprehensive ornamental tree assessment included in Appendix F-1.

B. EXISTING CONDITIONS

HABITAT

The Saratoga Race Course site is predominantly comprised of mowed lawn with shade trees interspersed with buildings and paved surfaces in a park-like setting. The Project Site's shade trees are comprised of several species that occur most frequently, including Norway maple (*Acer platanoides*), white pine (*Pinus strobus*), sugar maple (*Acer saccharum*), red maple (*Acer rubrum*), and pitch pine (*Pinus rigida*). Additional species also occur at lower frequency, such as American elm (*Ulmus americana*), black cherry (*Prunus serotina*), black oak (*Qeurcus velutina*), blue spruce (*Picea pungens*), Douglas fir (*Pseudotsuga menziesii*), and eastern hemlock (*Tsuga canadensis*). [Saratoga Race Course Tree Risk Assessment, Urban Forest Analytics, May 2012]. This predominant habitat type onsite is best characterized as "mowed lawn with trees" as listed in the New York Natural Heritage Program's *Ecological Communities of New York State*.[1]

The easternmost portions of the site, most notably on that portion of the site north of Union Avenue used for maintenance and storage, contain grasses and herbaceous plants typical of disturbed sites and meadows. These areas contain such species as red clover (*Trifolium pretense*), mullein (*Verbascum thapsus*), asters (*Aster sp.*), bristle grass (*Setaria sp.*), beggar ticks (*Bidens sp.),* fescue grass (*Festuca pratensis*), chickory (*Cichorium intybus*), Queens Anne's lace (*Daucus carota*), mugwort (*Artemisia vulgaris*), mountain mints (*Picnanthemum sp.),* burdock (*Arctium minus*), and common milkweed (*Asclepias syriaca*). Wet meadow occurs in the easternmost portion of the site, as mapped by the NWI (See Chapter 6, "Surface Water Resources and Wetlands"). In this area, and elsewhere in areas of stormwater discharge at the easternmost portions of the Project Site, such species as common reed (*Phragmites australis*), pussy willow (*Salix discolor*), cattail (*Typha latifolia*), seedling red maple (*Acer rubrum*), rough stemmed goldenrod (*Solidago rugosa*), bush honeysuckle (*Diervilla lonicera*), rush and sedges (*Carex sp, Juncus sp.*) are found. Areas of meadow habitat represent a very small minority of the overall site, and are located outside the proposed regions of redevelopment.

The eastern and southern periphery of the Project Site is bordered by forested lands of the adjacent Yaddo Gardens property which can be characterized as "appalachian oak-pine forest" as described by Edinger et al.[1] This forest consists of mixed oaks (*Q. velutina, Q. montana, Q. rubra*) with white pine (*Pinus strobus*), pitch pine (*Pinus rigida*), hemlock (*Tsuga canadensis*), and black cherry (*Prunus serotina*) in the overstory with an understory of blueberries (*Vaccinium angustifolium*) and huckleberry (*Gaylussacia baccata*). This habitat type is largely offsite.

[1] Edinger, G.J., D.J. Evans, S. Gebauer, T.G. Howard, D.M. Hunt, and A.M. Olivero (editors). 2002. Ecological Communities of New York State. 2nd Edition. New York Natural Heritige Program, NYSDEC, Albany, NY.

CRITICAL ENVIRONMENTAL AREAS (CEA):

Local or state agencies may designate a Critical Environmental Area under subdivision 6 NYCRR 617.14(g) of the SEQRA regulations. CEAs are areas which have been designated to recognize a specific geographical area with one or more of the following characteristics:

- A feature that is a benefit or threat to human health;
- An exceptional or unique natural setting;
- Exceptional or unique social, historic, archaeological, recreational or educational values; or
- An inherent ecological, geological or hydrological sensitivity to change that may be adversely affected by any physical disturbance.

The Saratoga Project Site is not within nor is it adjacent to any CEA. The nearest CEA is the "Loughberry Lake Watershed Area CEA," located approximately ¾ of a mile north of the Saratoga Race Course and designated by the City of Saratoga Springs in 1986 to protect the water supply.[1]

WILDLIFE

Due to the largely developed condition of the Project Site, which has been used actively as a racecourse for over 160 years, wildlife use of the site is limited to those animals adapted to human uses and suburban conditions. These include such common species as gray squirrel (*Sciurus carolinensis*), American robin (*Turdus migratorius*), house sparrow (*Passer domesticus*), mourning dove (*Zenaida macroura*), American crow (*Corvus brachyrhynchos*), Canada goose (*Branta canadensis*), house mouse (*Mus musculus*), eastern mole (*Scalopus aquaticus*), raccoon (*Procyon lotor*), eastern chipmunk (*Tamias striatus*), striped skunk (*Mephitis mephitis*), Virginia opossum (*Didelphis virginiana*), woodchuck (*Marmota monax*), eastern cottontail (*Sylvilagus floridanus*), and white-tailed deer (*Odocoileus virginianus*). Common reptile and amphibian species may make infrequent use of the site including such species as garter snake (*Thamnophis sirtalis*), American toad (*Bufo americanus*) and red-backed salamander (*Plethodon cinereus*). These and other species that can be expected to frequent the Project Site are all abundant species that benefit from proximity to humans (synanthropic species).

Less common animal species known for the area include the American bittern (*Botaurus lentiginosus*) and sharp-shinned hawk (*Accipiter striatus*), both NYS "special concern" [2] species recorded by the NYS Breeding Bird Atlas project for the region northeast of the Project Site (BBA Census Block 5977D). In addition, the NYS Herp Atlas project lists two "special concern" species as recorded for the Saratoga Springs USGS quadrangle map within which the Project Site is located. These are the wood turtle (*Clemmys insculpta*) and eastern hognose snake (*Heterodon platirhinos*). With the exception of the sharp-shinned hawk, none of these less common species can be expected to utilize the Project Site because they require habitats not present within the highly developed areas of the Saratoga Race Course property. The sharp-shinned hawk requires forested lands and is not typically found where trees are scarce or

[1] http://www.dec.ny.gov/docs/permits_ej_operations_pdf/loughberry.pdf

[2] 6 NYCRR Part 182. "Special Concern" species are those native species of wildlife found by the NYSDEC to be at risk of becoming threatened in New York and which require some measure of protection to ensure that the species does not become threatened.

scattered. While this species may occasionally forage along the eastern forested edge of the Project Site, it would not use the site for breeding/nesting because it lacks the dense forest this bird requires.

THREATENED AND ENDANGERED SPECIES

The NYNHP, a partnership between NYSDEC and the State University of New York College of Environmental Science and Forestry, indicated in correspondence dated May 10, 2013 that it has records of occurrence of two species of State/Federally-listed of wildlife in the vicinity of the proposed project (within 0.5 miles).

- Karner Blue butterfly (*Plebejus melissa samuelis*) – NYS *endangered*, Federally *endangered*
- Frosted Elfin butterfly (*Callophrys irus*) – NYS *threatened*

In addition, the U.S. Fish and Wildlife Service has recently listed one species as "proposed endangered" for Saratoga County as a whole, although the NYNHP has no records of its occurrence in the vicinity of the Project Site.

- Long-Eared Bat (Myotis septentrionalis) – Federal *proposed endangered*

KARNER BLUE BUTTERFLY (PLEBEJUS MELISSA SAMUELIS)

The Karner Blue butterfly is State and Federally listed as "endangered." The Karner Blue formerly occurred in a band extending across 12 states from Minnesota to Maine and in the province of Ontario, Canada.[1] It now only occurs in seven states, one of which is New York. Based on the decline of the Karner Blue across its historic range, it was listed as Federally endangered in 1992. The Karner Blue butterfly was once common in New York within areas underlain by the sand deposit outwash from glacial Lake Albany, which includes the Saratoga area.

The Karner Blue butterfly is dependent on wild lupine (*Lupinus perennis*), its only known larval food plant, and on additional nectar plants for adult feeding. Lupinus perennis is a member of the pea family (*Fabaceae*) and is an early successional species adapted to survive on dry relatively infertile soils. Lupine does not reproduce in dense shade. Disturbances that reduce tree and shrub canopy cover are necessary for lupine to persist. The wild lupine historically occurred in savanna and barrens habitats (oak/pitch pine) typified by dry sandy soils. Wild lupine and Karner Blue butterflies now occur in remnants of these habitats, as well as other locations conducive to the persistence of wild lupine, such as roadsides, military bases, utility corridors, and some forest lands. Primary limiting factors for the Karner Blue are loss of habitat through development and canopy closure (succession) without a concomitant restoration of habitat.

Recovery Units are established for Federally endangered species to preserve geographically associated genetic variation and to buffer against large-scale variation or disturbance. The Saratoga Race Course Project Site is located in the general geographic area encompassed by the Saratoga West Recovery Unit for the Karner Blue. The boundaries of RUs are not meant to be interpreted strictly, but are meant to indicate the potential geographic extent of the species based on current information about the location of suitable habitat. Within this Recovery Unit, the Saratoga County Airport and Saratoga Spa State Park have known populations of the Karner

[1] U.S. Fish and Wildlife Service. 2003. Final Recovery Plan for the Karner Blue Butterfly (Lycaeides Melissa samuelis). U.S. Fish and Wildlife Service, Fort Snelling, Minnesota. 273 pp.

Blue and are protected by Memoranda of Agreement (MOUs), which govern mowing regimes and habitat improvement efforts.

The currently developed condition of the Project Site with its open, park-like character and intense in-season use is not conducive to the Karner Blue butterfly. In addition, the NYSDEC has indicated that the status and location of all currently existing populations of the butterfly and its host plant are well known by the Department. None are known for the Project Site. Therefore, the butterfly is not expected to occur on the Saratoga Race Course.

FROSTED ELFIN (CALLOPHRYS IRUS)

The NYS "threatened" Frosted Elfin butterfly is a rare, non-migratory, single-brooded species inhabiting pitch-pine, scrub-oak, and other open habitats on sandy and rocky soil. The species has become globally rare and is extirpated in Canada. Much of its habitat has been lost in New York State. There may be fewer than five viable metapopulations State-wide. The key habitat feature for this species is an abundance of the appropriate larval food plant which occurs in remnant pine barrens, oak savannas, or dry oak forest. There are two varieties of Frosted Elfins, one that feeds mostly on the flowers or seed pods of Wild Blue Lupine (*Lupinus perennis*), and another that feeds on leaves and stems of Wild Indigo (*Baptisia spp*.), primarily the native Baptisia tinctoria in New York. Both plants are members of the pea family (*Fabaceae*). Populations will feed on only of these plants or the other, even when both types of plants are present. Lupine feeders occur in the Albany area, western New York, and on Long Island, while Wild Indigo feeders occur on Long Island. Frosted Elfins are not likely to be found in stands of lupine that have been isolated for a long period of time. This species nearly always occurs in clusters of populations that function as metapopulations and small habitat patches may be unoccupied in some years. Similar to the Karner Blue butterfly, its habitat is characterized by dry clearings and open areas that are natural (e.g. savannas) or of human origin (e.g. power-line right of ways and roadsides).[1] As discussed above for the Karner Blue butterfly, the NYSDEC was contacted to determine the potential for occurrence of this species on the Project Site. The NYSDEC knows the locations of extant Karner Blue populations in the Saratoga region. They were contacted concerning this project and indicated there are no known sites in or near the Project Site (Saratoga Racetrack). In addition, due to the predominant mowed/maintained habitat in the open areas of the site, and lack of records of wild blue lupine onsite, ecological consultants for NYRA through communications with NYSDEC find that there is no appropriate habitat or any Frosted Elfin populations utilizing the Project Site.

NORTHERN LONG-EARED BAT (MYOTIS SEPTENTRIONALIS)

The northern long-eared bat (*Myotis septentrionalis*) is a cave-hibernating bat of eastern North America that has recently undergone severe population declines due to the outbreak of White-nose Syndrome (WNS), an emerging infectious disease that was first discovered in Howe's Cave near Albany in 2006. Populations have declined by 98% and the species was recently proposed by the USFWS for listing as Endangered under the Endangered Species Act. The northern long-eared bat was recently listed as Federally "threatened" (Federal Register on April 2, 2015) and an interim 4(d) Rule was simultaneously issued listing specific activities which are exempt from the prohibitions of the ESA, including clearing of less than 1.0 acre of forest and other forest

[1] NYNHP Conservation Guide – Frosted Elfin (Callophrys irus) – March 18, 2013.

management activities provided these activities do not occur within ¼ mile of a known hibernaculum or roost tree.

Pre- and post-WNS count data available from 18 northern long-eared bat hibernacula in New York State show local population extinction at all but 4 of the sites and suggest an average statewide population decline of 97%.[1] The hibernaculum closest to the proposed Project Site where, as of 2011, the northern long-eared bat was still known to occur is Hailes Cave in Albany County, in which 4 wintering individuals were found during 2011 surveys.[18] Hailes Cave is approximately 51 km south of the Project Site, which is within the distance northern long-eared bats have been known to travel between their winter hibernaculum and their summer habitat.[2] As such, any northern long-eared bats potentially persisting in the Hailes Cave population would have the potential to occur within the Project Site outside of the hibernation period. However, non-hibernating northern long-eared bats generally inhabit mature, closed-canopy, intact forest within heavily forested landscapes.[3] The long-eared bat is considered to be an interior forest-dependent species that requires large tracts of unbroken forest for both foraging and breeding;[4] roost trees and foraging areas are usually close to the forested core and away from gaps, clearings, roads, or other edges.[5] The Project Site is park-like, with manicured lawn, paved roads

---

[1] Turner, G.G., D.M. Reeder, and J.T.H. Coleman. 2011. A five-year assessment of mortality and geographic spread of white-nose syndrome in North American bats and a look to the future. Bat Research News 52:13-27.

[2] Caceres, M. and R.M.R. Barclay. 2000. Myotis septentrionalis. Mammal Species 634:1-4.

[3] Owen, S.F., M.A. Menzel, W.M. Ford, B.R. Chapman, K.V. Miller, J.W. Edwards, and P.B. Wood. 2003. Home-range size and habitat used by the northern myotis (Myotis septentrionalis). American Midland Naturalist 150:352-359.

Carter, T.C., and G.A. Feldhamer. 2005. Roost tree use by maternity colonies of Indiana bats and northern long-eared bats in southern Illinois. Forest Ecology and Management 219:259-268.

Ford, W.M., M.A. Menzel, J.L. Rodrigue, J.M. Menzel, and J.B. Johnson. 2005. Relating bat species presence to simple habitat measures in a central Appalachian forest. Biological Conservation 126:528-539.

[4] Broders, H.G., G.J. Forbes, S. Woodley, and I.D. Thompson. 2006. Range extent and stand selection for forest-dwelling northern long-eared and little brown bats in New Brunswick. Journal of Wildlife Management 70:1174-1184.

Foster, R.W. and A. Kurta, A. 1999. Roosting ecology of the northern bat (*Myotis septentrionalis*) and comparisons with the endangered Indiana bat (*Myotis sodalis*). Journal of Mammalogy 80:659-672.

Henderson, L.E., L.J. Farrow, and H.G. Broders. 2008. Intra-specific effects of forest loss on the distribution of the forest-dependent northern long-eared bat (Myotis septentrionalis). Biological Conservation 141:1819-1828.

[5] Menzel, M.A., S.F. Owen, W.M. Ford, J.W. Edwards, P.B. Wood, B.R. Chapman, and K.V. Miller. 2002. Roost tree selection by northern long-eared bat (Myotis septentrionalis) maternity colonies in an industrial forest of the central Appalachian mountains. Forest Ecology and Management 155:107-114.

Owen, S.F., M.A. Menzel, W.M. Ford, B.R. Chapman, K.V. Miller, J.W. Edwards, and P.B. Wood. 2003. Home-range size and habitat used by the northern myotis (Myotis septentrionalis). American Midland Naturalist 150:352-359.

Patriquin, K.J. and R.M.R. Barclay. 2003. Foraging by bats in cleared, thinned and unharvested boreal forest. Journal of Applied Ecology 40:646-657.

Carter, T.C., and G.A. Feldhamer. 2005. Roost tree use by maternity colonies of Indiana bats and northern long-eared bats in southern Illinois. Forest Ecology and Management 219:259-268.

and walkways, individual shade trees, and buildings, and therefore lacks preferred habitat for northern long-eared bats. No large, unbroken forest is available in the area, and the surrounding landscape is largely urbanized. As such, and given the near extinction of the species from the region,[1] the possible occurrence of the northern long-eared bat within the Project Site is considered extremely remote.

FUTURE WITHOUT THE PROPOSED PROJECT (NO-BUILD CONDITION)

HABITAT

In the future without the project, existing habitats on the Project Site would not change. The Saratoga Race Course operations would continue, and the predominant "mowed lawn with trees" community type would be maintained indefinitely.

WILDLIFE

No changes are expected to wildlife use of the site in the future without the project because the current use, and current habitat cover types, would be maintained as-is in the future. Common wildlife species adapted to urban/suburban conditions can be expected to continue to frequent the Project Site.

THREATENED, ENDANGERED, AND SPECIAL CONCERN SPECIES

Because the habitat characteristics of the Project Site would remain largely unchanged in the future without the proposed project, the potential for State and Federally listed species to occupy the Project Site is the same as at present. As discussed above, none of the State or Federally listed species known for the region are expected to use the Project Site due to its developed condition and due to the active recreational uses which occur during the racing season.

PROBABLE IMPACTS OF THE PROPOSED PROJECT (BUILD CONDITION)

HABITAT

The overall habitat type on the Project Site would not change in the future with the Proposed Project. Renovation and relocation of existing buildings and construction of new structures within the overall campus would result in some loss of undeveloped lawn area as well as some restoration and landscaping of previously paved and developed areas. With full build-out of the Proposed Project, which is expected to occur over a ten-year period, the total conversion of mowed lawn would be approximately one acre. This loss of lawn area would not be detrimental to any specific species or regionally rare habitat type. On the contrary, reuse/rehabilitation of existing developed areas including parking areas as is conceived by the Proposed Project minimizes demand for other lands, which may result in the conversion of forest and farmland

[1] Turner, G.G., D.M. Reeder, and J.T.H. Coleman. 2011. A five-year assessment of mortality and geographic spread of white-nose syndrome in North American bats and a look to the future. Bat Research News 52:13-27.

Langwig, K.E., W.F. Frick, J.T. Bried, A.C. Hicks, T.H. Kunz, and A.M. Kilpatrick. 2012. Sociality, density-dependence and microclimates determine the persistence of populations suffering from a novel fungal disease, white-nose syndrome. Ecology Letters 15:1050-1057.

further from the urban core. In this way, redevelopment of the Saratoga Race Course Project Site lessens the regional impact of development on natural resources.

Results of the tree-risk assessment for the Saratoga Race Course property recommends the removal and replacement of 232 priority trees due to their poor condition. This represents a minority of the overall number of shade trees on the site. It is expected that up to 10 percent of the total number of trees identified as priority for removal would be removed and replanted in the initial phase of the proposed project, focused initially on those which are necessary to create a safe environment for visitors, with subsequent tree removals performed in coming years to reinvigorate the stock of shade trees and to provide for a safe environment for visitors. All trees to be removed would be replaced with native deciduous and evergreen species appropriate for the racecourse's park-like setting. This 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. In addition, the mowed lawn and tree habitat that predominates on the Project Site is not rare or important for any sensitive species.

CRITICAL ENVIRONMENTAL AREAS (CEA):

The Loughberry Lake Watershed Area CEA is located upgradient of the Project Site. Therefore, stormwater runoff generated from the Proposed Project drains eastwards, away from this public water supply watershed. The project would have no direct or indirect impacts to this CEA.

WILDLIFE

Temporary disturbance to the urban-tolerant wildlife species that currently utilize the Project Site may occur during construction of the components of the Proposed Project over the coming ten-year build-out period. All species that occupy the site are abundant and able to accommodate the levels of construction noise and temporary displacement that can be expected with the Proposed Project. No animal species would be permanently displaced by the new structures proposed for the Project Site. No rare species currently occupy the Project Site. Therefore, no impacts are expected to more sensitive animals or to the existing onsite wildlife population.

THREATENED, ENDANGERED, AND SPECIAL CONCERN SPECIES

As discussed under Existing Conditions, neither the Karner Blue butterfly, Frosted Elfin butterfly, nor their larval host plants, occur on the Project Site. Therefore, the Proposed Project would have no detrimental effect to these State/Federally-listed butterfly species.

The northern long-eared bat is a forest interior species for which preferred habitat is not present within the Project Site. Although the Capital Region of NY contains several hibernacula of the northern long-eared bat,[1] the Project Site lacks unfragmented, interior forest habitat, which the northern long-eared bats traditionally use during summer roosting season. In addition, the species has been nearly extirpated from the surrounding region, and the potential for northern long-eared bats to occur within the Project Site is therefore considered to be extremely limited. If northern long-eared bats were to occur within the Project Site, the Proposed Project would have the potential to cause adverse effects to the species by removing potential roost trees. The

[1] Turner, G.G., D.M. Reeder, and J.T.H. Coleman. 2011. A five-year assessment of mortality and geographic spread of white-nose syndrome in North American bats and a look to the future. Bat Research News 52:13-27.

Proposed Project includes the removal and replacement of 232 shade trees from within the grounds over an approximately 9-year period. Trees that would be removed from the Project Site are underlain by manicured lawn and walkways, where there are high levels of human activity during the facility's operating season. Although use of these trees by northern long-eared bats is unlikely, following the USFWS Interim 4(d) Rule for avoiding impacts to the northern long-eared bat, all tree removal for the Proposed Project would be conducted outside the pup season (June 1-July 31). Hazardous tree removal, for reasons of safety, are exempt from the Interim 4(d) Rule. Non-hazardous tree removal will require coordination with the USFWS Field office to ensure there are no occurrences of NLEB within ¼ mile of recent records of occurrence of hibernaculum or summer roost trees. Prior to initiating tree removal activities each year during the 9 year build-out of the proposed project, NYRA will communicate with the USFWS Field Office to determine if updated records of occurrence occur within ¼ mile of the Project Site and will implement NLEB impact avoidance measures in coordination with the USFWS. With such measures in place, the Proposed Project would not be expected to have significant adverse impacts to the northern long-eared bat or its habitat.

POTENTIAL CUMULATIVE IMPACTS

The small quantity of permanent habitat conversion (less than one acre) required for the placement of new structures in existing lawn areas is expected to be partially offset by the restoration and landscaping of previously disturbed areas and is not expected to constitute a cumulative impact to regional ecology. The "mowed lawn with trees" habitat type onsite is common in the region and serves to subsidize habitat generalist species, such as Canada geese and gray squirrels. Redevelopment of human-dominated landscapes, such as that which occupies the Project Site at present, minimizes demand for conversion of forest and farmland and lessens the regional, cumulative impact of development on natural resources.

Sixty-six (66) proposed developments ("no-build projects") currently under review by the City, have been considered in Chapter 11, "Traffic and Transportation," of this environmental impact statement to determine the potential cumulative impacts of the project. As indicated by examination of aerial photos, size of properties on which the projects would be located, and in consideration of the description of these 66 no-build projects planned within the City, construction of some of the proposed "no build" projects would require substantially more impact to ecological resources, including forest loss, habitat loss, and potential impacts to rare species, as compared to the Saratoga Race Course Redevelopment project. All of these projects taken together have the potential to diminish forested lands within the boundaries of the City to a small degree. The additional, cumulative contribution of the Saratoga Race Course Redevelopment Project to the current level of development proposed in the City is negligible, for the reasons described above; the proposed project is a redevelopment of already developed lands, much of which is limited to alteration of existing buildings. Overall, the cumulative loss of forested habitat as may occur with the approval of all projects currently before the City, would not constitute a significant adverse impact, especially when considered from the perspective of regional development patterns. Development in urban cores (such as the City of Saratoga Springs) rather than in ex-urban areas, which can be used to describe the surrounding lands of Saratoga County, is an appropriate use of a finite resource. Centered growth minimizes urban sprawl, minimizes traffic and greenhouse gas (GHG) emissions, and preserves natural resources in the long term, and is a foundation of environmental planning and appropriate land use. Development within the City of Saratoga Springs can be characterized as "centered

growth", and is therefore conserving of natural resources, in the larger context of development within surrounding rural communities.

MITIGATION

No significant impacts to natural resources are expected to occur with the Proposed Project. Although use of Project Site by northern long-eared bats is unlikely, all tree removal for the Proposed Project would nevertheless be limited to the winter hibernation period (October 31 to March 31) to avoid any potential direct impact. No additional natural resource specific mitigation is proposed. As explained in Chapter 7, "Stormwater Management," erosion controls and stormwater management measures would be developed for each component of the Redevelopment Plan 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. ✷