

**Appendix A**  
**DGEIS Adopted Scope of Work**

**September 16, 2013**  
**Saratoga Race Course Redevelopment Plan**  
**DGEIS Final Scoping Document**

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**A. INTRODUCTION**

The New York Racing Association (NYRA) (“the Applicant”) has prepared a Redevelopment Plan which includes proposed improvements to the historic Saratoga Race Course in Saratoga Springs, New York. The Redevelopment Plan includes both specific planned elements (primarily for the Frontside area) that have established design criteria and several conceptual or more generic improvements that will be further refined or scheduled for implementation into the future. This Generic Environmental Impact Statement (GEIS) is intended to provide the Franchise Oversight Board (FOB), other involved agencies, the public and interested agencies with an understanding of the potential environmental impacts associated with the implementation of the Redevelopment Plan (the “Proposed Project”). A “Generic” EIS or GEIS is prepared when the Proposed Project represents a comprehensive program that has wide application, defines a likely range of future projects, and is implemented over a longer time frame.

The goal of the Proposed Project is to ensure that the Saratoga Race Course retains its status as a world-class horse racing facility and a key component in the character of the local community and the regional economy. The proposed improvements seek to maintain and emphasize the historic character of the Race Course while responding to changes in the global racing landscape to ensure a sustainable future for racing at Saratoga.

The Proposed Project is located in Saratoga County, New York, within the City of Saratoga Springs (see Figure 1). The project site is located in the southeast portion of the City of Saratoga Springs and is bisected by Union Avenue approximately midway between downtown Saratoga and I-87 (the “Project Site”). The Project Site is bordered on the south by Nelson Avenue, on the north by Fifth Avenue, on the west by Nelson and East Avenue, and on the east by Henning Road and is divided by Union Avenue. The Project Site can be accessed by two major roadways Route 9 (South Broadway) and I-87 via exit 14 to Union Avenue (NYS Route 9P) as well as exits 13 to the south and exit 15 to the north. The Project Site comprises approximately 330 acres of mostly contiguous parcels located on both sides of Union Avenue and Nelson Avenues.

Pursuant to the rules and regulations of the State Environmental Quality Review Act (SEQRA, Article 8 of the Environmental Conservation Law and its implementing regulations at 6 NYCRR 617), the FOB, as lead agency, has determined that a GEIS will be prepared. Based on the FOB’s review of an Environmental Assessment Form (Parts 1, 2, and 3), a positive declaration was issued on June 13, 2013. A Draft Scoping Document was prepared to guide in the preparation of the Draft GEIS and described the Proposed Project, the approvals required for implementation of the Proposed Project, and the proposed scope of work for the EIS. The Draft Scoping Document was circulated to provide the public with an opportunity to comment on the issues that will be studied in the GEIS. To facilitate public input, two public meeting sessions were held on July 11, 2013 in Saratoga Springs, NY with a detailed notice of location and time issued in advance of the meeting. The public comment period continued through July 30, 2013. This Final Scoping Document reflects the substantive comments submitted during the public scoping period and in coordination with the lead agency in its review of the Draft Scoping Document. There were no oral comments made at the public scoping meeting and the single written comment from the New York State Department of Transportation is found in Appendix

A of this scoping document. Substantive issues identified during the scoping process were incorporated into this Final Scoping Document.

## **B. PROJECT DESCRIPTION**

### **PURPOSE AND NEED**

Saratoga Race Course is the oldest racecourse still in existence in the United States and is the oldest sports facility in the country. No overarching review of the site's historic facilities has occurred on the site in over 100 years. The racetrack has numerous buildings of various ages and is part of an historic district. Many of the buildings on the Project Site are contributing historic resources to the historic district and need to be rehabilitated and modernized. The Proposed Project seeks to preserve the historic landscape and character of the Race Course while providing a broader spectrum of service choices and an enhanced overall experience through infrastructure improvements and upgrades to Race Course facilities.

The proposed improvements and upgrades seek to maintain and emphasize the historic character of the Race Course while responding to changes in the global racing landscape to ensure a sustainable future for racing at Saratoga. The proposed improvements outlined in the Redevelopment Plan are not expected to lengthen the racing season or to substantially increase overall attendance or attendance patterns, particularly on peak Saturdays. There would also be no substantial changes to the existing non-seasonal use of the facility as a result of the Proposed Project.

### *PURPOSE OF THE GEIS*

The Proposed Project includes both specific planned elements (primarily for the Frontside area) that have established design criteria and several conceptual or more generic improvements that will be further refined or scheduled for implementation into the future. This GEIS is intended to assess the environmental impacts of the Proposed Project and will evaluate both the specific planned elements as well as the conceptual or generic future improvements. It will define the elements of the Redevelopment Plan for which there is a specific program and will identify and detail any adverse impacts related to the implementation of these elements.

In addition, as will be detailed in the GEIS Project Description, and as undertaken in each of the subsequent technical analyses as appropriate, the GEIS will provide a generic analysis of the potential environmental impacts associated with the range of the conceptual or generic future improvements defined in the Redevelopment Plan and will set the analysis parameters from which impact thresholds for these future actions carried out under the Redevelopment Plan can be measured against. The GEIS will also identify and disclose typical and ongoing reinvestment in the Race Course that would be considered not subject to additional environmental review. In this manner, the GEIS will allow for an environmental assessment of the cumulative effects of the overall Redevelopment Plan. The GEIS will describe and organize elements of capital improvement in three basic categories:

- Background Projects—These projects include on-going capital investment in the current facilities and identified projects expected to occur with or without implementation of the Proposed Project such as routine fence maintenance. The GEIS will include a list of these projects;
- Conceptual/Generic Improvements—These improvements and changes such as refurbishment of the dorms are within the range of future projects identified as part of the Redevelopment Plan and are expected to be implemented over the next ten years but have not yet been planned or designed. It is anticipated that the GEIS analysis will inform the

design of these conceptual or generic improvements which are expected to enhance facility operations but will not alter the public use of the Race Course; and,

- Specific Planned Elements—These improvements such as the new Nelson Avenue Service Building have been developed with concept plans and specific design criteria established.

## PROJECT HISTORY

Gideon Putnam first established the hotel and spa that would become Saratoga Springs in 1802. The mineral springs around which the resort centered quickly became famous for their curative properties and within decades were the center of one of the nation's most popular and lively resorts. Organized horse racing began in the 1840s with the establishment of the Saratoga Trotting Course (now the location of Horse Haven within the present Race Course). The early Race Course was famously expanded and re-envisioned by John Morrissey. Morrissey enlarged the course and improved the facilities, adding a mile-long track and a grandstand. These improvements, coupled with well-promoted high-caliber events firmly established the Race Course as the most fashionable and well-regarded racing facility in the country by the time of Morrissey's death in 1878.

As the sport of racing boomed in North America through the late 19th century, the course at Saratoga continued to thrive, led by Gottfried Walbaum. Many of the facility's iconic buildings were constructed during his tenure. The present Grandstand, designed by Herbert Langford Warren, was erected in 1891 and new attention was given to landscape design and course layout. In 1901, William Collins Whitney assumed leadership of the Race Course and invested in the grounds, almost doubling the acreage of the facility, creating the Oklahoma Track, and hiring landscape engineer Charles Leavitt to integrate the design of the landscape and buildings of what are now known as the Frontside and Backstretch. Much of the landscape design as well as many of the buildings that distinguish the facility today originated during this period.

The 1920s and 1930s were also a period of expansion and improvement at the Race Course. Engineer S.J. Mott was retained to improve the parking and circulation pattern at the facility. A large Clubhouse, designed by Samuel Adams Clark, was added to the Grandstand in 1928. During the Great Depression, another transformation occurred, as the anti-gambling lobby gave way to increasing legalization of betting, including pari-mutuel wagering on horses. After a brief closure during World War II, the Race Course received new attention following the 1950s founding of NYRA. The firm Arthur Froehlich and Associates, a preeminent designer of racetracks was hired to plan expansions, such as the expansion of the Grandstand, which occurred in 1965. Other changes made in the 1970s and 80s altered the earlier landscape design and introduced new structures.

In 2008, NYRA prepared the 2008 Capital Projects Strategy. This document was a strategic review of NYRA facilities to determine which facilities NYRA would require to ensure a sustainable future for New York Racing. The 2008 Study concluded that NYRA's core racing product was the best in the country despite periods of difficulty in recent history. To maintain its competitive standing, the study concluded that NYRA's equine racing facilities must maximize the number of horses and the quality of horses raced in New York. It also concluded that the existing Race Course facilities and amenities should be upgraded and enhanced and recommended improvements to patron facilities that would build on the existing racecourse brands.

NYRA began to communicate with the Saratoga community its intention to respect the history of the Race Course in considering redevelopment plans. Historic resource inventories of the Frontside and Backstretch were commissioned from the Saratoga Springs Preservation

Foundation, Inc., a local preservation advocacy group. Also during this period, NYRA developed a conceptual plan for the Frontside and Backstretch, which was informed by the historic resources inventory and sought to increase revenue at the Saratoga Race Course in a sustainable manner. The plan identified a series of potential projects at Saratoga that could be brought forward when funding became available. Lastly, NYRA communicated these developments to the public through the release of the Capital Projects Strategy Potential Projects presentation at the Saratoga meet in 2011.

In 2012, NYRA built upon the conceptual studies undertaken in 2011 in undertaking more detailed studies regarding potential improvement projects at Saratoga. Background surveys of the existing buildings and other infrastructure at the Race Course were prepared; a master plan, cost plan and financial analysis of the proposed improvements were undertaken; the environmental compliance process was initialized; and clear recommendations for potential projects at the Race Course were developed that could be implemented using a programmatic approach over a period of time.

### **REDEVELOPMENT PLAN SUMMARY**

The Proposed Project is the implementation of the Redevelopment Plan to preserve, restore and enhance the historic Saratoga Race Course, and includes the construction of new buildings, parking areas, pedestrian facilities including walkways and pavilions, horse paths, planted areas, etc., as well as the improvements to and the renovation of existing buildings and facilities, including upgrades to utilities, and removal of certain structures. The projects identified in the Redevelopment Plan are limited to within the Race Course property boundaries and will be implemented over an assumed ten-year period based on need, schedule, and funding. The projects are divided between the site's two primary redevelopment areas: the Frontside and Backstretch (see Figure 2). A more detailed description of proposed Frontside improvements is shown in Figure 3. The GEIS will assess the overall Redevelopment Plan for the Race Course, which includes both the Frontside and the Backstretch. The key elements of each primary redevelopment area are summarized below:

#### *FRONTSIDE*

- Development of a new Nelson Avenue Service Building
- Development of a new At the Rail Building to include clubhouse and judges stand
- Improvements to the Grand Stand and Carousel including development of a Top of the Stretch Club
- Improvements to the Apron and Winner's Circle
- Renovation of the Old Jockey House
- Development of a new Jockey House and renovation of Clark's Cottage
- Renovation of the historic saddling shed
- Improvements to the Lincoln Entrance
- Expansion of the picnic area and installation of a new amphitheater
- Improvements to the East Avenue Entrance
- Improvements to the Picnic Area including new bathrooms and shelters
- Improvements to the Grand Stand Garden including new seating and landscaping

#### *BACKSTRETCH*

- Improvements to electrical infrastructure to serve dormitories
- Improvements to horse circulation and pathways
- Landscape improvements

- New and refurbished dormitories (increase of 280 beds)
- New and refurbished stables (increase of 250 stalls)
- Refurbishment of three historic houses: Clare Court, Sandford and Dupont
- Refurbishment of Facility Manager's House
- Refurbishment of other historic buildings
- Development of a new administration building

## **PERMITS AND APPROVALS**

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

### *NEW YORK STATE*

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

### *SARATOGA COUNTY*

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

### *CITY OF SARATOGA*

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

## **C. REQUIRED ELEMENTS OF THE DGEIS**

The DGEIS shall contain an analysis of environmental impacts in the substantive areas outlined below:

- A description of the Proposed Project;
- A site-specific description of the environmental setting;
- An analysis of the potential environmental impacts of the Proposed Project, including its short- and long-term effects, and typical associated environmental effects;
- An identification of significant adverse environmental effects that cannot be avoided if the Proposed Project is implemented;

- A discussion of alternatives to the Proposed Project;
- An identification of irreversible and irretrievable commitments of resources that will be involved if the Proposed Project is implemented; and,
- A description of measures proposed to avoid, minimize, or mitigate significant adverse environmental impacts of the Proposed Project.

## **ORGANIZATION AND EXPECTED CONTENT OF THE DGEIS**

### *COVER SHEET AND GENERAL INFORMATION*

The Cover Sheet shall identify: the Proposed Project; its location; the name, address, and phone number of the Lead Agency; the name, address, and phone number of the Preparer of the DGEIS; the Date of Acceptance of the DGEIS by the Lead Agency; and the date of the Public Hearing and the closing of the Public Comment Period.

Additional information, to be provided on pages following the Cover Sheet, shall list: the name(s) and address(es) of the Applicant and its representatives; and the name(s) and address(es) of all consultants involved in the project and their respective roles.

The DGEIS shall include a list of all Involved and Interested Agencies to which copies of the document and supporting material will be distributed. In addition, project information can be also be found on the NYRA website: <http://www.nyra.com/saratoga/information/capital-improvements/>

A Table of Contents followed by a List of Tables, List of Figures, and Technical Appendices shall be provided. The Technical Appendices currently anticipated include: agency correspondence, traffic impact study, cultural resources inventory, and air and noise back-up information.

### *EXECUTIVE SUMMARY*

- A. Introduction
- B. Description of the Proposed Project including a table listing all the elements of the Redevelopment Plan and the impact thresholds for the range of conceptual or future generic improvements that future actions carried out under the Redevelopment Plan can be measured against.
- C. List of all local, county, State, and federal approvals required
- D. Statement of Project purpose and need
- E. Summary of potential significant adverse environmental impacts identified in each subject area
- F. Summary of mitigation measures proposed for potential significant adverse environmental impacts
- G. Description of alternatives analyzed

### *CHAPTER 1 – PROJECT DESCRIPTION*

- A. Project Site Description and Setting
- B. Proposed Project—Description in text and graphics, of the proposed Redevelopment Plan for the Saratoga Race Course including both the specific planned elements as well as the conceptual or generic future improvements. This section will define the elements of the Redevelopment Plan for which there is a specific program and several conceptual or generic improvements that will be further refined or scheduled for implementation into the future. For the less-defined elements as well as for the project overall, this section will identify generic thresholds that future actions carried out under the

Redevelopment Plan can be measured against. This section will also include a description of the number, type and location of uses, proposed construction and/or alterations proposed in relation to buildings, landscape features, and infrastructure, and a description of circulation and site access.

- C. Purpose and Need
- D. Project History
  1. A description of existing structures and other site features that will be reused/rehabilitated and those that will be demolished.
  2. Summary of dates and conclusions for previously prepared projects and studies for the Project Site
- E. Permits and Approvals

#### *CHAPTER 2 – LAND USE, COMMUNITY CHARACTER, ZONING, AND PUBLIC POLICY*

- A. Existing Conditions
  1. Describe and map existing land uses within ¼ mile of the Project Site.
  2. Describe and map existing zoning within ¼ mile of the Project Site.
  3. Describe pending or recently approved projects within the study area.
  4. Describe surrounding community character using text and photographs.
  5. Summarize relevant sections of relevant public policy documents.
- B. Future Without the Proposed Project (No-Build Condition)
  1. Identify projects that have recently been approved within one (1) mile of the Project Site.
- C. Probable Impacts of the Proposed Project (Build Condition)
  1. Land Use, Community Character, and Zoning
    - a. The redevelopment(s) may facilitate or induce further land use changes and development in the project area, particularly along Union and Nelson Avenues. The growth-inducing aspects of the project will be discussed in terms of its possible geographic extent, what type of growth and development might occur, and how induced growth can be managed in a sustainable manner to limit adverse impacts on the environment. Potential population changes and how site development can be designed and managed to minimize adverse changes will be addressed based in part on lessons learned from similar projects elsewhere and consultation with local and regional stakeholder agencies and organizations.
  2. Describe cumulative impacts of the proposed Project and other approved projects as specified in Section 2.A.3.
  3. Consistency with Public Policy – Describe the consistency of the Proposed Project with existing planning documents and public policies identified above in 2.A.5.
  4. Consistency with the Capital Region’s Sustainability Plan— Discuss the Proposed Project’s consistency with the Capital Region’s Sustainability Plan, including a discussion of the Proposed Project’s consideration of smart growth, sustainability and climate resiliency.

- D. Mitigation – Describe the measures, if any, which will be implemented to mitigate adverse impacts to Land Use, Community Character, Zoning, and Public Policy from the Proposed Project.

### *CHAPTER 3 – COMMUNITY SERVICES*

- A. Existing Conditions
1. Describe educational, police, fire, emergency service, health care, recreational and solid waste facilities and providers potentially affected by development of the Proposed Project.
  2. Identify and estimate demand for community services of existing Race Course facility on an annual basis and during the race season, including information from Race Course officials, local service providers.
  3. Describe the existing manure management at the Race Course.
  4. Through consultation with the school district, City of Saratoga Springs, fire department, and emergency medical service providers, describe the current operations and capacity of the community services identified above.
- B. Future Without the Proposed Project (No-Build Condition)
1. Using publicly available information, describe impacts to educational, police, fire, emergency service, health care, recreational, and solid waste facilities and providers in the future without the Proposed Project.
- C. Probable Impacts of the Proposed Project (Build Condition).
1. Discuss the anticipated public costs associated with the provision of services, potentially including: educational, police, fire, emergency service, health care, recreational, gambling-related social services, solid waste facilities and private carters to the Project Site.
  2. Describe the potential impacts to the response times of emergency vehicles to the Project Site.
  3. Discuss cumulative impacts that the Proposed Project and other approved projects identified in Chapter 2 may have on the provision of educational, police, fire, emergency service, health care, recreational, and solid waste facilities and private carters.
  4. Describe any anticipated changes in generation rates of horse waste and any changes to on-site manure management.
- D. Mitigation
1. Describe mitigation that may be required as a result of the Proposed Project including estimated costs associated with such mitigation.
  2. Compare the potential costs of providing community services to the economic benefits of the Proposed Project as detailed in Chapter 14.

### *CHAPTER 4 – GEOLOGY, SOILS, AND TOPOGRAPHY*

- A. Existing Conditions
1. Describe and map existing Project Site geology using existing available information.
  2. Describe and map existing Project Site soils using existing available information.
  3. Describe and map existing Project Site topography. Identify slopes in the following categories: 0-20%; 20%-30%; >30%.

- B. Future Without the Proposed Project (No-Build Condition)
  - 1. Using publicly available information and previously completed documentation, describe the potential impacts on geology, soils and topography from the development of previously approved projects on the Project Site
- C. Probable Impacts of the Proposed Project (Build Condition)
  - 1. Describe impacts of development of the Project Site on Site geology, topography and soils
- D. Mitigation
  - 1. Describe measures, if any, which will be implemented to mitigate potentially adverse impacts of the Proposed Project.

#### *CHAPTER 5 – NATURAL RESOURCES*

- A. Existing Conditions
  - 1. Using publicly available and previously published information, and aerial photography, describe and map habitat types present within the Project Site.
  - 2. Based on site surveys and new field reconnaissance, consultation with the NYSDEC Natural Heritage Program and US Fish and Wildlife Service (USFWS), and drawing on other resources as appropriate, describe Rare, Threatened and Endangered Species or species listed as Special Concern, which may be on the Project Site including the Frosted Elfin butterfly (threatened) and the Karner Blue butterfly (endangered).
- B. Future Without the Proposed Project (No-Build Condition)
  - 1. Using publicly available information and previously completed studies, describe the potential environmental impacts on natural resources from the development of previously approved project(s) on the Project Site.
- C. Probable Impacts of the Proposed Project (Build Condition)
  - 1. Describe the potential environmental impacts to natural resources, including impacts to Rare, Threatened and Endangered Species or species listed as Special Concern as a result of the Proposed Project including the Frosted Elfin butterfly (threatened) and the Karner Blue butterfly (endangered).
  - 2. Identify potential cumulative impacts to natural resources from the Proposed Project and other approved projects as described in Chapter 2.
- D. Mitigation
  - 1. Identify the measures, if any, which will be implemented to mitigate adverse impacts to natural resources.
  - 2. Describe in text and graphics the conceptual landscaping plan for the Redevelopment Plan. Discuss the use of native species as well as deer resistant species.
  - 3. Describe the process and criteria for identifying and mitigating potentially adverse impacts to natural resources not addressed in the DGEIS from future phases of the Proposed Project.

#### *CHAPTER 6 – SURFACE WATER RESOURCES AND WETLANDS*

- A. Existing Conditions
  - 1. Identify and describe surface water resources and wetlands based on published, federal, state and local wetland mapping resources and site specific, previously issued US Army Corps of Engineers Jurisdictional Determinations and NYSDEC

- Freshwater Wetland Validations. Conduct new field reconnaissance of Project Site to confirm absence or presence of wetlands or surface waters.
2. Identify any principal or primary aquifers within the Project Site. Describe the water table depth within the Project Site, to the extent it is known.
  3. Identify and map areas that have an increased risk of flooding, including any FEMA identified flood zones and dam hazard areas.
- B. Future Without the Proposed Project (No-Build Condition)
1. Using publicly available information and previously prepared studies, describe the potential impacts to surface water resources and wetlands in the future without the Proposed Project.
- C. Probable Impacts of the Proposed Project (Build Condition)
1. Qualitatively discuss the potential impact of development of the Project Site on surface water resources and wetlands.
  2. Identify the impacts to any aquifers that are located on the Project Site. Describe the impacts that the Project may have on the local water table level, or that the water table level may have on the Proposed Project.
  3. Identify the impacts of the Proposed Project on areas of increased flooding risk.
- D. Mitigation
1. Describe proposed mitigation measures, if any, to address potentially adverse impacts to surface water resources and wetlands.
  2. Qualitatively describe the process for identifying and mitigating impacts to surface water resources and wetlands not addressed in the DGEIS from future phases of the Proposed Project.

#### *CHAPTER 7 – STORMWATER MANAGEMENT*

- A. Existing Conditions
1. Describe the general drainage flow patterns, existing facilities and impervious surface coverage, and stormwater infrastructure that prevail on the Project Site including any drainage flows into the State Highway System.
  2. Qualitatively describe stormwater quantity or quality control features within the Project Site.
- B. Future Without the Proposed Project (No-Build Condition)
1. Using publicly available information, discuss the possible stormwater impacts of other approved projects within the study area, including adjacent properties such as Yaddo.
- C. Probable Impacts of the Proposed Project (Build Condition)
1. Discuss potential stormwater impacts of the Proposed Project.
  2. Discuss the potential for cumulative stormwater impacts from the Proposed Project and other approved projects within the study area including impacts to the State Highway drainage system from post development flows.
- D. Mitigation
1. Discuss the regulatory context of stormwater runoff management, including the involvement of local, State, and regional authorities.
  2. Discuss the process for evaluating and mitigating possible impacts from future phases of the Proposed Project.
  3. Discuss potential stormwater treatment techniques that may be applied.

*CHAPTER 8 – WATER SUPPLY*

- A. Existing Conditions
  - 1. Identify the existing water supply to the Project Site.
  - 2. Describe the current requirements for water supply systems within the Saratoga Race Course.
- B. Future Without the Proposed Project (No-Build Condition)
  - 1. Using publicly available information and previously completed studies, describe the anticipated impact to water supplies of previously approved projects within the study area.
- C. Probable Impacts of the Proposed Project (Build Condition)
  - 1. Describe proposed changes, if any, to the water supply system to serve the Proposed Project.
  - 2. Describe the anticipated demand for potable water generated by development of the Project Site, including usage and sources.
- D. Mitigation
  - 1. Discuss the Proposed Project’s compliance with the requirements of local, state, and regional regulations including NYSDEC, NYSDOH, and the Saratoga County Water Authority.
  - 2. Discuss the potential mitigation required to ensure sufficient capacity of the water system serving the Project Site (including sources, treatment facilities, and transmission and distribution networks).
  - 3. Discuss potential impacts that the development of the proposed water system will have and mitigation required for areas within the study area.

*CHAPTER 9 – SANITARY SEWER SERVICE*

- A. Existing Conditions
  - 1. Describe the sewage collection and treatment systems that serve the Project Site.
  - 2. Describe the infrastructure of the appropriate Sewer District, including a discussion of the capacity of the treatment plant.
- B. Future Without the Proposed Project (No-Build Condition)
  - 1. Describe the potential impacts of currently approved projects in the Sewer District on the capacity of the existing treatment plant.
- C. Probable Impacts of the Proposed Project (Build Condition)
  - 1. Describe the demand for wastewater treatment generated by development of the Project Site.
  - 2. Describe the proposed plan for providing sanitary sewer service for the Proposed Project.
  - 3. Describe the impacts of the Proposed Project on the capacity of the existing treatment plant.
- D. Mitigation
  - 1. Regulatory Context – Discuss the requirements of local, State, and regional regulations including those of NYSDEC or other agencies with respect to the provision of sanitary sewer service.
  - 2. Discuss the potential build out of the sewage collection and conveyance systems that will serve the Project Site.

3. Impacts to other sites in the Sewer District – Discuss the impacts that the Proposed Project will have on other sites within Sewer District with respect to the provision of infrastructure and the capacity of the Sewer District treatment plant.

#### CHAPTER 10 – ENERGY & TELECOMMUNICATIONS

- A. Existing Conditions
  1. Describe the current electrical and telecommunications services provided to the Project Site, as well as the capacity of current service providers and infrastructure.
- B. Future Without the Proposed Project (No-Build Condition)
  1. Using publicly available information, describe the potential demand for energy and telecommunications in the future without the Proposed Project.
- C. Probable Impacts of the Proposed Project (Build Condition)
  1. Describe the estimated electrical and telecommunication requirements generated by development of the Project Site.
  2. Describe any energy saving elements of the Redevelopment Plan and consistency with existing local or State energy conservation policies.
- D. Mitigation
  1. Regulatory Context – Describe the requirements of local and State regulations with respect to the provision of energy and telecommunications.
  2. Describe plans to provide electricity and other energy required for the Project Site.
  3. Electricity – Describe the capacity of local service providers to provide electricity to the Project Site. Discuss the potential for non-traditional energy generation on the Project Site, including renewable energy generation.
  4. Heating Energy – Describe the plans for providing energy for the Proposed Project’s heating and non-electrical energy needs.
  5. Telecommunications – Discuss infrastructure improvements that will be required to provide the Project Site with required telecommunications service.

#### CHAPTER 11 – TRAFFIC AND TRANSPORTATION

This chapter will summarize and incorporate the key findings of the Traffic Impact Study (TIS), which will be prepared following the guidance of the Institute of Transportation Engineers (ITE) *Summary of a Proposed Recommended Practice-Traffic Access and Impact Studies for Site Development*. The TIS will present the results of the traffic-related analyses including project related trip generation and assignment, no-build and build condition volumes, pedestrian and transit assessment, accident analysis, and related roadway and intersection improvements.

- A. Existing Conditions
  1. Roadway Network – Describe roadway characteristics including classifications, ownership, number of lanes by direction, pavement markings, pavement conditions, on-street parking, bus stops, percent heavy vehicles, traffic control devices, and pedestrian conditions, including sidewalk conditions.
  2. Traffic Impact Analysis Intersections – Based on a preliminary analysis of existing volumes, trip generation, trip assignment, and anticipated volumes of new traffic, the following intersections would potentially experience an increase in traffic associated with the Proposed Project which might have significant adverse impacts and would be included in the traffic impact study for capacity analysis:
    1. Broadway/CR 50/Van Dam Street
    2. Broadway/Lake Avenue

3. Broadway/Washington Street
  4. Broadway/Congress Street
  5. Broadway/Spring Street
  6. Broadway/Circular Street/Ballston Avenue
  7. Broadway/Lincoln Avenue
  8. Crescent Avenue/Route 9
  9. Crescent Street/Route 9
  10. Circular Street/Union Avenue
  11. Lake Avenue/High Rock Avenue
  12. East Avenue/Union Avenue
  13. East Avenue/Lake Avenue
  14. East Avenue/Excelsior Avenue
  15. East Avenue/N. Broadway/CR 50
  16. Marion Avenue/CR 50
  17. Nelson Avenue/Union Avenue
  18. Nelson Avenue/Lincoln Avenue
  19. Nelson Avenue/Crescent Street
  20. Nelson Avenue/Gridley Street
  21. Nelson Avenue/Crescent Avenue/CR 22
  22. Circular Avenue/Spring Street
  23. Circular Avenue/Lake Avenue
  24. I-87 ramp intersection at Interchange 13 northbound on to Route 9
  25. I-87 ramp intersection at Interchange 13 southbound on to Route 9
  26. I-87 ramp intersection at Interchange 13 northbound Route 9 to I-87
  27. I-87 ramp intersection at Interchange 13 southbound Route 9 to I-87
  28. I-87 ramp intersection at Interchange 14 northbound ramp
  29. I-87 ramp intersection at Interchange 14 southbound ramp/westbound Union Ave
  30. I-87 ramp intersection at Interchange 14 southbound ramp/eastbound Union Ave
  31. I-87 ramp intersection at Interchange 15 northbound ramp
  32. I-87 ramp intersection at Interchange 15 southbound ramp for westbound CR 50
  33. I-87 ramp intersection at Interchange 15 southbound ramp for eastbound CR 50
  34. Union Avenue/Henning Road
  35. Henning Road/Lake Avenue
  36. New Street/W. Fenlon Street/CR 50
3. Operational Characteristics – Present a summary of the operational characteristics of the intersections directly and indirectly influenced by the Proposed Project.
  4. Traffic Data Collection – The traffic data collection program for the Proposed Project has already been performed. NYRA issued the Saratoga Race Course Traffic Data Collection RFP on June 22, 2012. American Traffic Information, Inc. was awarded the contract on July 17, 2012. The traffic, transportation, pedestrian and parking data collection as outlined was collected between July 29 and August 6, 2012.
  5. Traffic Characterization – Based on the collected traffic data, analyze and describe traffic volume patterns during the day. Key peak periods associated with arrivals and departures from the Race Course will be determined. It is anticipated that there will be two peak periods analyzed for both a weekday and Saturday condition.
  6. Capacity Analysis – Perform a vehicular capacity analysis at each of the Traffic Impact Analysis intersections using the latest version of Synchro 8 traffic modeling and optimization software which implements the Intersection Capacity Utilization

- 2003 methodologies for determining intersection capacity. (Synchro 8 also implements the methodologies presented in the 2010 Highway Capacity Manual to evaluate intersection service conditions for average delay per vehicle and level-of-service (LOS)). Present Synchro results in a tabular format for each intersection and the two peak periods analyzed for the weekday and on Saturday.
7. Traffic Safety – Using the most recent three (3) years of available accident data records from the New York State Department of Transportation (NYSDOT) and the City of Saratoga Springs for intersections and roadways in the Traffic Impact Study Area, summarize the data in tabular form to determine general vehicular, pedestrian, and bike safety conditions in the study area.
  8. Characterize in the study the City of Saratoga Springs Police Department’s traffic management plan implemented in conjunction with events at the Saratoga Race Course. This will include a list of the traffic signals that the police manually control as well as the list of street closures/changes implemented by the police during an event.
  9. Describe vehicular and pedestrian volumes and circulation patterns in the vicinity of the race course.
  10. Describe official race course and other parking lot locations within walking distance (about 3/4 mile from the track) as well as utilization patterns for employees and patrons.
  11. Describe public transit and local shuttle bus usage within ½ mile of the perimeter intersections included within the study area.
  12. Describe existing horse crossings and circulation.
- B. Future Without the Proposed Project (No-Build Condition)
1. Background Traffic Growth – Based on anticipated build-out period of ten years (or a future analysis year of 2023), estimate traffic volumes in the study area in the future without the Proposed Project (the No Build Condition). A background growth factor to account for general traffic growth in the study area will be determined based on consultation with NYSDOT and the City of Saratoga Springs. Capital improvements at the Race Course already underway or otherwise independent of the Proposed Project would be included in the No Build scenario as would trips generated by other know proposed or approved. The estimate of trips generated by other project traffic reports will be utilized and where no information is available, trips generated by No Build projects will be estimated by using Institute of Transportation Engineers (ITE) Trip Generation (9th edition) rates and/or similar resources. Also, all major planned roadway improvements within the study area will be identified and included in the No Build analysis.
  2. Capacity Analysis – Perform a capacity analysis at each of the study area intersections for the future without the Proposed Project. Present LOS results in a tabular format for each intersection and peak periods. The study will present a comparison of Existing versus No Build Conditions and highlight where significant degradations in operating conditions would occur.
  3. Describe any notable changes that could affect pedestrian, parking, on-site/off-site circulation and public transit/shuttle bus conditions within the study area.
- C. Probable Impacts of the Proposed Project (Build Condition)
1. Proposed Circulation Changes and Trip Generation – The Proposed Project will result in changes to current circulation patterns associated with the location and access/egress to parking, deliveries and loading, and pedestrian circulation. The

likely diversion or rerouting of vehicular and pedestrian traffic will be mapped and assessed to determine study area locations that will potentially see additional or decreased amounts of Race Course related traffic. In addition, the Proposed Project may also result in an incremental increase of new trips associated with new overall activity on the site (i.e., expanded food and beverage sales, new stables and dormitories, and from any anticipated increase in overall attendance on weekday or weekends.

2. Capacity Analysis – Perform a capacity analysis at each of the Traffic Impact Study Area intersections to assess potential vehicular and pedestrian impacts of the Proposed Project (for the 2023 analysis year). Present in tabular form a comparison of the incremental change from No Build to Build conditions with Proposed Project. Significant adverse impacts associated with the change in LOS or other capacity measure will be identified as well as potential measures to mitigate the impact (e.g., signal retiming, lane restriping, geometric changes to roadways, traffic calming measures, adaptive control strategies, video monitoring, etc.).
3. Traffic Management Plan – Based on the results of the study and the analysis of the existing Traffic Management Plan currently in place, develop measures to improve the Traffic Management Plan where necessary. This could include, without limitation, such measures as: increased staff presence to direct traffic and pedestrians on-site and to/from the race course to the parking areas and other venues, improved way-finding signage, improve pavement markings and signage, develop improved ways to assist or coordinate with the police department, etc.
4. Describe any potential impacts due to Proposed Project changes to pedestrian, parking, on-site/off-site circulation; emergency services, public transit/shuttle bus, and horse transporter conditions in the study area will be described.
5. Drainage to State Highway System – Drainage plans for any flows affecting the State High System will be prepared and submitted to NYSDOT.

#### D. Mitigation

- a. Describe the process for identifying and mitigating impacts to traffic and transportation from future phases of the Proposed Project.
- b. Describe mitigation measures that may be necessary as a result of cumulative impacts from the Proposed Project and other approved projects identified in Chapter 2.
- c. Identify mitigation improvements for any state highway intersections or segments that will require a State Highway work permit.

### CHAPTER 12 – AIR QUALITY

#### A. Existing Conditions

1. Collect and summarize existing ambient air quality data for the study area. Ambient air quality monitoring data published by the NYSDEC will be compiled for the analysis of existing as well as future background conditions.

#### B. Future Without the Proposed Project (No-Build Condition)

1. Using publicly available information, describe potential impacts to air quality in the future without the Proposed Project.

#### C. Probable Impacts of the Proposed Project (Build Condition)

1. Mobile Source Impacts of the Proposed Project – Analyze carbon monoxide impacts for the Proposed Project using procedures from the NYSDOT *Environmental*

*Procedures Manual (EPM)* or latest available NYSDOT guidance, and traffic data (i.e., volume diagrams, HCS outputs, etc.).

- a. Perform a screening analysis of intersections evaluated under the traffic analysis to determine which locations will be chosen for further detailed study. Intersections will be chosen based on the procedures outlined in the NYSDOT EPM or latest available NYSDOT guidance and Guidelines for Modeling Carbon Monoxide Roadway Intersections issued by the US Environmental Protection Agency (EPA).
  - b. For intersections with a Level of Service of “D” or worse in the Build Condition, use the EPM capture criteria to determine whether intersections require further study. If any of the capture criteria are met, perform a volume threshold screening analysis at affected intersections.
  - c. The intersections selected for first level screening will be based on the traffic network.
  - d. As necessary, if any intersections do not pass the volume threshold screening criteria, a mobile source analysis will be performed using EPA’s CAL3QHC dispersion model version 2 to predict the maximum change in carbon monoxide concentrations, and to determine if the potential for exceedances of the carbon monoxide ambient standard exists at intersections near the Project Site.
2. Stationary Source Impacts of the Proposed Project
- a. Qualitatively assess the potential for any significant adverse impacts from fossil-fuel fired HVAC heating systems. The analysis will identify the location and nature of any new combustions sources and will assess the emissions and potential impacts from these units.
  - b. As necessary, if a qualitative analysis of the Proposed Project’s HVAC systems shows the potential for significant adverse impacts, station source emissions will be evaluated using NYSDEC Policy DAR-1 (Air Guide 1) screening analyses to determine the potential for significant pollutant concentrations from fossil-fuel fired HVAC heating systems.
  - c. As necessary, if the screening analysis predicts impacts that exceed National and State Ambient Air Quality Standards (NAAQS), a refined stationary source analysis will be performed.
- D. Mitigation
1. Mobile Sources – As necessary, for locations where significant traffic impacts are identified, evaluate the feasibility of potential mitigation measures.
  2. Stationary Sources – As necessary, in the event that exceedance of NAAQS are predicted, consider design features to reduce pollutant levels to within NAAQS, such as fuel switching, adjusting the stack locations on the buildings, and adjusting stack heights or velocities.

#### CHAPTER 13 – NOISE

- A. Existing Conditions
  1. Describe and quantify existing levels of noise on the Project Site based on noise monitoring at specified receptor locations.
- B. Future Without the Proposed Project (No-Build Condition)
  1. Using publicly available information, describe potential noise related impacts in the future without the Proposed Project.

- C. Probable Impacts of the Proposed Project (Build Condition)
  - 1. With qualitative and limited quantified analyses, assess the potential noise impacts resulting from the Proposed Project on both the Project Site and on sensitive receptors surrounding the Project Site.
    - a. Site and circulation changes – The Proposed Project would create new circulation patterns for trucks, autos, and pedestrian movements. The potential effects of different or new noise generation from these circulation changes will be identified and assessed.
    - b. Construction related noise – Qualitatively describe the potential for construction noise impacts, including: types of equipment and activities, location of activities, duration of activities, material deliveries, and work schedules. Identify noise sensitive locations adjacent to the proposed construction activities.
- D. Mitigation
  - 1. Describe the process for mitigating impacts of the Proposed Project including:
    - a. Mobile source noise mitigation, if any
  - 2. If applicable, identify and qualitatively discuss opportunities to limit and attenuate noise at sensitive receptors or indoor locations
  - 3. Describe codes and ordinances applicable to construction related noise.

#### *CHAPTER 14 – ECONOMIC CONDITIONS*

- A. Existing Conditions
  - 1. Describe the existing demographic and economic conditions in the City of Saratoga Springs and Saratoga County using 2010 Census data and American Community Survey Data.
  - 2. Describe the existing inventory commercial and other uses in the City and County.
  - 3. Describe the existing tax revenues to the City, School District, other special taxing districts, County, and State from the Project Site.
- B. Future without the Proposed Project (No-Build Condition)
  - 1. Using publicly available information and previously prepared and approved documents, summarize the potential economic impacts of previously approved projects in the City of Saratoga Springs.
- C. Probable Impacts of the Proposed Project (Build Condition)
  - 1. Qualitatively describe the potential impacts of development of the Project Site.
  - 2. As appropriate, quantitatively analyze the potential economic impacts of the Proposed Project.
  - 3. Discuss estimated tax revenues generated by the Proposed Project to the City of Saratoga Springs, School District, other special taxing districts, Saratoga County, and New York State.
  - 4. Discuss the approximate number of employees that will be generated by the Proposed Project, including information with regard to type, salary level, and full-time or part-time status.
  - 5. Analyze the economic and fiscal benefits during the construction period, including: the number of jobs to be generated directly and indirectly as a result of construction and income to the local economy from sales of construction material, construction labor, and sales tax.

6. Describe the capacity of the local workforce with regards to construction of the Proposed Project.

D. Mitigation

1. Using the analysis performed in Chapter 3, Community Services, compare the estimated economic benefits of the Proposed Project with the potential costs associated with providing additional municipal services at the local, county and State level.

## CHAPTER 15 – CULTURAL RESOURCES

A. Existing Conditions

1. Identify and summarize the applicable legislation related to cultural resources analysis, including SEQRA, the New York State Historic Preservation Act (SHPA), and Racing Law Sec 212.8(b). Inventory known cultural resources in the Project Site and study area will be inventoried, including architectural resources (National Historic Landmarks [NHLs] and properties listed on or previously determined eligible for listing on the State and National Registers of Historic Places [S/NR]) and archaeological resources (previously identified archaeological sites on file at the New York State Museum and New York State Office of Parks, Recreation, and Historic Preservation [OPRHP]). In addition, an architectural historian will identify historic properties (properties that meet the S/NR eligibility criteria but have not previously been evaluated by OPRHP) in the Project Site and study area through a reconnaissance-level survey, which would include field visits and limited research. The presence or absence of significant archaeological resources that may be affected by the Proposed Project will be determined through the preparation of a Phase I Archaeological Study. If appropriate based on the results of the Phase I Study, a Phase II Archaeological Study would be conducted to determine the significance (S/NR eligibility) of identified archaeological resources.

B. Future Without the Proposed Project (No-Build Condition)

1. Using publicly available information presented in the Land Use section, assess the potential impacts of approved projects on cultural resources in the Project Site and study area.

C. Probable Impacts of the Proposed Project (Build Condition)

1. Identify and describe in accordance with SEQRA and SHPA the potential for adverse impacts to cultural resources from the Proposed Project.

D. Mitigation

1. If cultural resources are identified that will be adversely affected by the Proposed Project, describe measures to avoid, minimize, or mitigate those impacts. Any such measures would be devised in consultation with OPRHP.

## CHAPTER 16 – VISUAL RESOURCES

The Proposed Project includes the potential introduction of new structural and landscape features, as well as the modification and/or removal of some existing features. Therefore, a

visual resources analysis will be conducted to determine the potential for the Proposed Project to impact visual character and aesthetic conditions of the Project Site and its immediate vicinity. The assessment will be written in accordance with the NYSDEC Visual Impact Assessment Methodology, “Assessing and Mitigating Visual Impacts,” (DEP-00-2) (July 2000).

A. Existing Conditions

1. Provide an overview of the visual resource analysis guidelines described in the NYSDEC Visual Impact Assessment Methodology, “Assessing and Mitigating Visual Impacts,” (DEP-00-2) (July 2000) referenced above. Describe the study area for the visual resources analysis including areas from which new project elements would be visible and where there is the potential for impacts to visual resources. Identify and describe existing visual resources. Visual resources may include landscape elements such as water bodies, designated historic structures and other cultural resources, parks, unique topographic or geologic features, and critical environmental areas, where applicable. Photographs will be used to document important visual resources. A descriptive narrative and photography will be used to illustrate the existing visual conditions of the Project Site and study area as well as the visibility of project components from vantage points within the study area during leaf-off condition.

B. Future Without the Proposed Project (No-Build Condition)

1. Using publicly available information and information on other approved projects identified in Chapter 2, describe the potential impacts to visual resources in the study area.

C. Probable Impacts of the Proposed Project

1. Describe the Proposed Project in the context of proximity to identified visual resources, orientation, design context, bulk, and height. Quantitatively describe any potential aesthetic impacts that would result from the Proposed Project. The impacts analysis will consider such factors as substantial changes to views, the number and type of viewers that would be affected, the duration of views, and whether or not the feature has been designated as a special resource or viewshed. The potential impacts of the Proposed Project will be depicted with the use of photo-simulations as necessary to illustrate the findings. Photo-simulations will reflect proposed structure heights and dimensions.

D. Mitigation

1. If the potential for visual impacts is identified, identify and describe measures to mitigate any such impacts. Mitigation may include measures to reduce or eliminate the visibility of the project’s effect on visual resources, such as screening, downsizing, relocation, or alternate materials.

*CHAPTER 17 – HAZARDOUS MATERIALS*

A. Existing Conditions

1. Based on an Environmental Site Assessment, site inspections, and a review of available records and historical maps and/or aerial photography, describe the previous uses of the Project Site.
2. Describe the potential for hazardous materials to be present within the Project Site based on the above and an evaluation of regulatory database listings.

3. Identify and map the location of areas within the Project Site entered into the Brownfield Cleanup Program (BCP) if applicable. Summarize the status of any such BCPs that have been authorized on the Project Site and discuss the process and parties responsible for continuing the remediation of those sites.
- B. Future Without the Proposed Project (No-Build Condition)
    1. Discuss the potential for the future removal of hazardous materials on Site in the absence of the Proposed Project.
  - C. Probable Impacts of the Proposed Project (Build Condition)
    1. Qualitatively describe the potential impacts to hazardous materials from the Proposed Project.
  - D. Mitigation
    1. Describe the requirements to document hazardous materials on the Project Site, as well as what mitigation may be required.
    2. Describe the process for the continuation and completion of any BCP project that has been authorized on the Project Site.

#### *CHAPTER 18 – CONSTRUCTION*

- A. Introduction
  1. Phasing – Discuss the anticipated phasing of construction for the Proposed Project, including a description of the areas included in each phase, the general types of construction anticipated to occur within each phase, and the anticipated development timeline.
  2. Qualitatively describe site preparation and grading work that will be required.
  3. Discuss the local, regional, and State requirements relating to construction noise, impacts to air quality and traffic, stormwater, and erosion control.
- B. Future Without the Proposed Project (No-Build Condition)
  1. Using publically available information and previously completed and approved documentation, describe the potential construction impacts from approved projects within the Project Site.
- C. Probable Impacts of Construction (Build Condition)
  1. Qualitatively describe the impacts of Project construction on traffic generation, air quality, and noise.
- D. Mitigation
  1. Describe a range of general construction mitigation measures that will be implemented to mitigate the impacts of construction on the Proposed Site and to adjacent land uses.
  2. Describe the erosion and sediment control plan.

#### *CHAPTER 19 – ALTERNATIVES*

- A. Identify alternatives to the Proposed Project, including the No Action Alternative and a reasonable range of design and use alternatives that provide an opportunity to minimize or avoid significant adverse impacts of the Proposed Project.
- B. Primarily based on qualitative assessment, identify the likely impacts associated with an Alternative in comparison with the Proposed Project

#### *CHAPTER 20 – UNAVOIDABLE ADVERSE IMPACTS*

- A. Document any significant unavoidable impacts identified in the previous chapters.

*CHAPTER 21 – MITIGATION*

- A. Describe measures proposed to mitigate any significant unavoidable impacts disclosed in the previous chapter.
- B. Describe the process for evaluating and mitigating significant unavoidable impacts from future phases of the Proposed Project that were not described in the DGEIS.

*CHAPTER 22 – IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES*

- A. Qualitatively describe the irreversible and irretrievable commitment of resources resulting from the Proposed Project.

*CHAPTER 23 – GROWTH INDUCING EFFECTS*

- A. Discuss the potential growth-inducing impacts resulting from the Proposed Project.

*CHAPTER 24 – IMPACTS ON THE USE AND CONSERVATION OF ENERGY*

- A. Summarize the anticipated energy demands of the Proposed Project as described in Chapter 10.
- B. Discuss the strategies proposed for reducing the Proposed Project’s energy demand.

**APPENDIX A: WRITTEN COMMENTS**

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STATE OF NEW YORK  
DEPARTMENT OF TRANSPORTATION  
REGION ONE  
ALBANY, NY 12232  
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SAM ZHOU, P.E.  
ACTING REGIONAL DIRECTOR

JOAN McDONALD  
COMMISSIONER

July 30, 2013

Ms. Carolyn Dunderdale  
NYS Office of General Services (agent for FOB)  
33<sup>rd</sup> Floor Corning Tower  
Empire State Plaza  
Albany, NY 12242

RE: New York Racing Association  
Saratoga Race Course Redevelopment Plan

Dear Ms. Dunderdale:

The New York State Department of Transportation is in receipt of Mr. Steven Lowenstein's (State of New York Franchise Oversight board) letter of June 20, 2013 seeking comment upon the issues to be addressed in the Draft Generic Impact Statement (DGEIS) that is to be developed for the "Saratoga Race Course Redevelopment Plan" (where 'the Plan' is the long range plan of improvements to the race course facilities to advance the racing experience for its customers and enhance accommodations for track staff, trainers and horseman).

It is NYSDOT's understanding that "the Plan" will outline improvements that will uphold, and highlight the historic character of the racing course, while being responsive to changes in global racing landscape to ensure a sustainable future at Saratoga. Further this effort does not intend to lengthen the racing season, or intend on increasing overall attendance/attendance patterns.

Prior documentation, indicative that there is the potentiality of modifications/ alterations to present patterns of vehicular and pedestrian traffic and circulation on and around the project site, and the uncertainty if the proposed project will result in the generation of traffic significantly above present levels, or if the existing network is adequate to handle the additional traffic piques our interest as a transportation agency, particularly as several of the facilities are under NYSDOT's jurisdiction.

We are pleased to see the extent that Traffic and Transportation will be addressed in the development of "the Plan," as proposed/presented in Chapter 11 of the DGEIS Draft Scoping document. It is felt that it is appropriate that Chapter 11 summarizes the findings of the Traffic Impact Study (TIS) performed, inclusionary of the project's trip generations and assignment; the no build and build condition volumes; a pedestrian and transit assessment; an accident analysis and a summary of related intersection improvements. It is believed that a summary of the operational characteristics of intersections (directly and indirectly) influenced by the implementation of "the Plan" should be included in Chapter 11.

Ms. C. Dunderdale  
July 30, 2013  
Page 2

Clarity is sought on the conditions under which the operational characteristics will be compared to one another. We would seek the existing condition be compared to the future no build condition and the future build scenarios.

It is believed that the TIS, in its entirety, should be included as an appendix to "the Plan." Related to the TIS, the Region finds following a document prepared by the Institute of Transportation Engineers (ITE), entitled Summary of a Proposed Recommended Practice - Traffic Access and Impact Studies for Site Development, (developed in an effort to provide consistency and curtail discrepancy on how such studies should be performed) conveys the extent and the quality of information necessary to address a project's transportation impact. (This document can be found at <http://www.ite.org/membersonly/itejournal/pdf/JHA88A17.pdf>)

As appropriately denoted in the Environmental Assessment Forms (EAF), a NYSDOT permit may be required for implementing components of "the Plan." For clarification, any work within the highway right of way (new or modified access drive(s), grading, drainage, sidewalk, signage, etc . . . will need to be reviewed by the Department prior to the issuance of a Highway Work Permit.

EAF Part 2 is indicative that the proposed project will alter existing drainage patterns, and that the impacts will be addressed in the GEIS. In as much as Chapter 7 (Stormwater Management) of the DGEIS Draft Scoping Document addresses pre and post drainage flows, NYSDOT would seek a Drainage Report that evaluates the pre and post-development flows into the adjoining state highway drainage system. (The Drainage Report, eventually be submitted to the Department for review and approval, is considered to be a professional engineering document that would be stamped and signed by a New York State Licensed Professional Engineer.)

NYRA's efforts to develop a comprehensive plan and implement "the Plan" to preserve and enhance the 330 acre historic Saratoga Race course over an assumed ten year period based on need, schedule and financing are applauded. Continuing Saratoga Race Course's status as a world class horse racing facility is indeed a key component of the character of the local community and regional economy.

Should you have any questions, or would like to discuss the content of this letter, please feel free to contact me at 457-6882.

Sincerely,



Robert S. Cherry, P.E.  
Dir., Transportation Planning, R-1

/rsc

cc: M. Kennedy, Regional Traffic Engineer, R-1, Suite 1S50  
/sar race redev seqrt