Attachment 10

Construction Impacts Memo

- Although the race track pavement width has reportedly been reduced to 36 feet, the total width of construction disturbance along the race track route is as much or greater than 300 feet in many areas and exceeds 400 feet in some areas. Drawing CP-1 "Construction Phasing Plan", indicates the limits of construction impacts are much greater than the race track alone. The Erosion Control drawings indicate steep (50%) cut slopes nearly 80 feet high and over 200 feet long will be required in order to achieve the race track profile. Drawing EC-12: Erosion Control Plan" (Track Station 110+50') indicates that the race track is to be cut 50 feet (likely into bedrock) below the existing ground surface and have an approximately 80 feet tall, 210 feet long cut slope in the vicinity of the proposed hotel in the southwestern corner of the property. A 320 feet wide swath is required in this area in order to meet the proposed grades. Significant cut of similar or greater magnitude are also illustrated elsewhere on the Erosion Control Plan sheets. The magnitude of the cut slopes is similar to that of an Interstate Highway in mountainous areas and would be anticipated to greatly change the hydrology of this site. In addition, the implementability of this project is questionable.

- The permanent noise attenuation berms required by Tamworth ordinance (see comment above) have not been included in the construction traffic management plan. Assuming 20 cubic yard capacity truck and trailers are used to deliver the necessary soil to construct the berms, 35,000 truckloads will be required. Based on the 9 to 12 months construction duration stated in Section 4.1, 130 to 180 truckloads per day will be required (5-day week assumed) to construct the noise attenuation berms alone.

- The magnitude of the cut slopes is similar to that of an Interstate Highway in mountainous areas: the implementability of this project from an engineering perspective is questionable. The cost to safely complete this construction is very high, which may place financial pressure on the owners from investors to expand usage of the facility for revenue enhancement.

- Figure 7.3 illustrates a race track width of approximately 40 feet (the application states that the paved width of the race track will be 36 feet (Application pg. 25)). Drawings CP-1 and EC-12 indicate that construction impacts (e.g. road cuts and embankments) range up to 400 feet.

- The hotel access road is "approximately 30 feet" (Application pg. 97). Drawing CP-1, "Construction Phasing Plan" indicates construction impacts will be 100 feet or greater.

- The Application (p.92) states "exposed areas of soil will be minimized to the extent practicable". What does "practicable" mean specifically? What areas of soil are expected to be exposed during construction? What length of time are soils expected to be exposed, and during what seasons of the year will the exposures occur?
- Control of dust (PM_{10}) during construction will likely be necessary to prevent air emissions violations. Parties responsible for monitoring, documenting, reporting and mitigating dust impacts, and the means to do so, should be clearly identified.